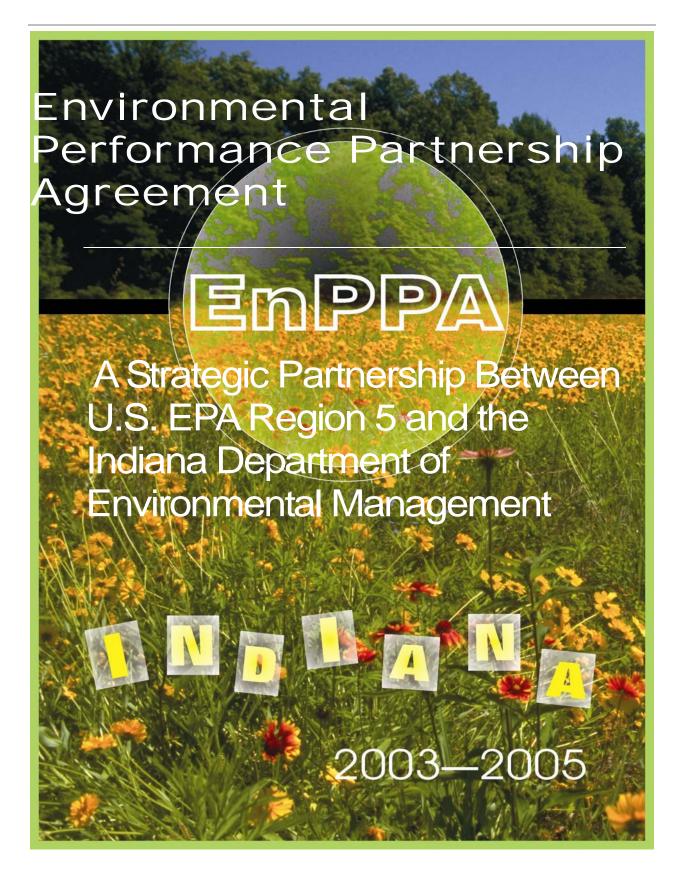
Phone: (317) 232-8603 Fax: (317) 233-6647



Phone: (317) 232-8603 Fax: (317) 233-6647

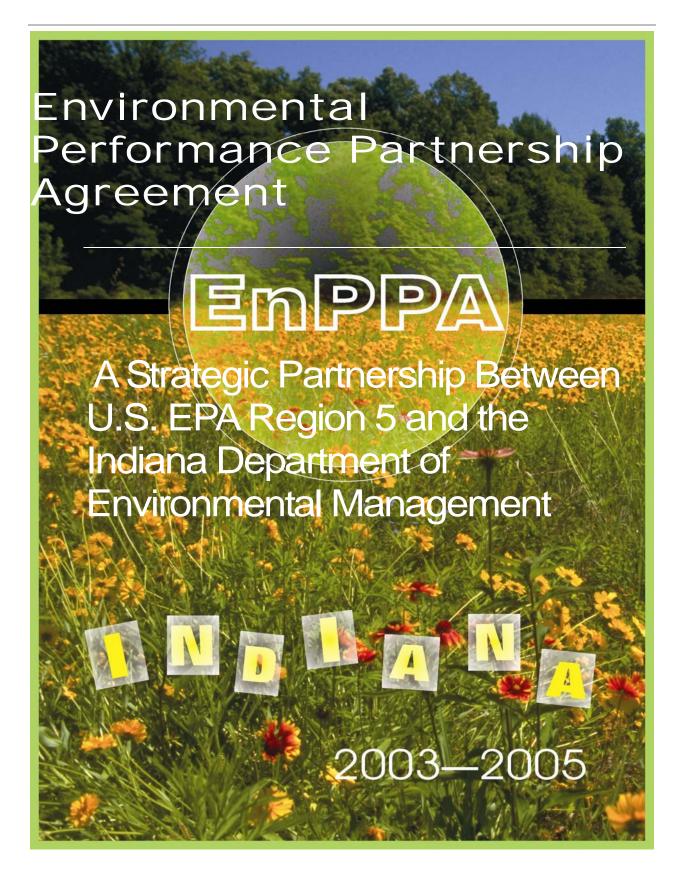


Table of Contents

GENERAL PURPOSE AND CONTEXT	1
1. Indiana's Environmental / Strategic Goals	5
2. Indiana's Priorities.	
2.1. IDEM Agency-Wide Priorities	
2.1.1. Maintain Essential Environmental Services and Deliver Services in as an Efficient Manner as Practical	
2.1.2. Coalition Building	
2.1.3. Prioritize Services and Programs to Achieve the Greatest Improvement in Air, Water and Land Quality	
2.1.4. Reducing Key Environmental Threats	
2.1.5. Building a Better IDEM	
2.2. IDEM Office Priorities	
2.2.1. Office of Agricultural Relations	
2.2.2. Office of Air Quality	
2.2.3. Office of Legislative and Business Relations	
2.2.4. Office of Community Relations	
2.2.6. Office of Enforcement	
2.2.7. Office of Land Quality	
2.2.8. Office of Legal Counsel	
2.2.9. Office of Management, Budget, and Administration	92
2.2.10. Northern Regional Office	
2.2.11. Northwest Regional Office	
2.2.12. Office of Planning and Assessment	
2.2.13. Office of Pollution Prevention and Technical Assistance	
2.2.14. Southwest Regional Office	
2.2.15. Office of Water Quality	
3. US EPA REGION 5 PRIORITIES	162
4. ROLES OF IDEM AND US EPA REGION 5 UNDER THIS AGREEMENT	163
5. MEASURING ENVIRONMENTAL RESULTS	
6. RELATIONSHIP OF AGREEMENT TO GRANTS	
7. QUALITY ASSURANCE (QA) AND QUALITY MANAGEMENT PLAN (QMP)	
8. Data Management	168
STATE / FEDERAL RELATIONSHIP	169
9. PRINCIPLES OF IDEM / EPA COMPLIANCE ENFORCEMENT RELATIONSHIP	170
9.3. Joint Planning / Worksharing	171
9.4. Consultation on Enforcement and Compliance Assurance Activities	
9.5. Striving For Program Evaluation through Self-Audits and Assessment	
9.6. Performance Measurement and Oversight	
10. IMPROVED DATA AND INFORMATION SHARING	174
11. Environmental Justice	175
IDEM'S PUBLIC INVOLVEMENT ACTIVITIES	177
REVIEW/ASSESSMENT PROCESS	170
REVIEW/ASSESSIVENT FROCESS	179
DISPUTE RESOLUTION PROCESS	183
12. Informal Dispute Resolution Guiding Principles	184
13. FORMAL CONFLICT RESOLUTION	
CONCLUSION	187
AGREEMENT	189
IDEM / EPA REGION 5 ORG. CHARTS	
DISPUTE RESOLUTION MODEL	
DISPLIE RESULTION MINER	194

Figures & Tables

•	Figure 1: Dispute Resolution Model	193
•	TABLE 1: FISCAL YEARS	181
•	TABLE 2: TIME FRAMES	182

Section

General Purpose and Context

The Indiana Department of Environmental Management (IDEM) is entering its eighth year with the National Environmental Performance Partnership System, or NEPPS. This system was created on May 17, 1995, when the U.S. Environmental Protection Agency (US EPA) Administrator Carol Browner and state representatives signed a "Joint Commitment to Reform Oversight and Create a National Environmental Performance Partnership System." This system recognizes two decades of environmental progress in the United States, but acknowledges that we must modify existing policies and management approaches to address our most pervasive and difficult to solve problems. Through NEPPS, US EPA and states work together to monitor environmental conditions and to develop innovative approaches to improve the quality of our nation's air, water and land. NEPPS also provides states with greater flexibility to achieve results while maintaining accountability for meeting national standards.

NEPPS consists of:

- Increased use of environmental goals and indicators,
- Self assessment by states of program accomplishments and barriers,
- Environmental Performance Partnership Agreements (EnPPA) between states and US EPA Regions,
- Reduced oversight and increased flexibility for states that demonstrate strong performance,
- Public outreach to increase awareness of environmental conditions and public involvement in setting goals and objectives,
- Joint US EPA and state evaluation of the new system.

This Environmental Performance Partnership Agreement (EnPPA) was created through a joint planning and priority setting dialogue between IDEM and US EPA Region 5, informed both by feedback from Indiana citizens and directions set by US EPA national, regional and state program managers. Through this agreement, we hope to continuously improve the US EPA IDEM relationship and our systems for managing environmental programs.

The agreement is based on several underlying assumptions:

- US EPA should rely on the states to manage environmental programs delegated to the states.
- States and US EPA should incorporate the public's ideas and concerns into our priority setting and planning.
- We should strive continuously to improve the products and services we provide.
- We must be accountable to stakeholders and communities who have a right to expect timeliness, efficiency, professionalism, and progress toward improved environmental conditions.
- We should maximize each other's strengths and eliminate duplication of effort to ensure the wisest use of public resources.
- States and communities must be afforded greater flexibility, as allowed by law, in applying rules and guidance to meet national goals and standards.

- The federal government retains a vital responsibility to ensure consistent implementation and enforcement of national laws, regulations and standards, and for ensuring that states provide fundamental public health and environmental protection to their citizens and those downwind and downstream.
- Maximize the use of environmental measures to gauge the success of work, and in turn use the results for management decisions.
- The work should be based on assessed environmental conditions with program resources managed to address areas that need attention.

US EPA has agreed to work with all states, using the new environmental performance partnership system, to reach agreements that are based increasingly on an assessment of the environmental conditions and needs in each state.

Environmental indicators, program performance measures, and reporting requirements will be used both to measure the fulfillment of state and US EPA Region 5 commitments under this agreement and to provide data to analyze the effectiveness of different approaches to environmental protection. US EPA Region 5 will monitor IDEM's basic program performance and fiscal responsibilities, as required by law. However, a basic goal of this agreement is to shift the primary focus of the US EPA Region 5 IDEM dialogue away from measuring activities and toward identifying and solving environmental problems.

This agreement is a part of a continuing cooperative effort between IDEM and US EPA Region 5 to work through the details of this significant cultural and institutional change in how we work with each other to protect Indiana's environment.

Scope of the Agreement

This agreement will be in effect from the signature date through 6/30/05. The portion of IDEM's planning document that is sent to US EPA Region 5 describes all IDEM programs that provide environmental protection to Indiana citizens and are funded or mandated by US EPA. In addition, IDEM has a supplemental planning document that covers key IDEM programs that are not funded or mandated by US EPA. Federal funding makes up about 25% of IDEM's overall budget. By having two portions to our planning document to included all IDEM programs, regardless of funding source, we are able to give Indiana citizens a broader picture of our efforts to protect and clean up Indiana's environment. US EPA Region 5's traditional oversight role, however, is limited to those programs carried out under the federal statutes and programs listed below:

- Clean Air Act
- Clean Water Act
- Surface Water Protection
- Ground Water Protection
- Wetlands
- Safe Drinking Water Act
- Public Drinking Water
- Solid Waste Disposal Act
- Resource Conservation and Recovery Act
- Underground Storage Tank (UST)
- Hazardous Waste Management
- Solid Waste Management

- Comprehensive Environmental Response, Compensation and Liability Act
- Superfund Amendments and Reauthorization Act
- Toxic Substances Control Act
- Asbestos Hazard Emergency Response Act

The agreement serves as IDEM's work plan for the following grants:

- air pollution control,
- TSCA-PCB enforcement,
- public water system supervision,
- water pollution control,
- hazardous waste management, and
- Underground Storage Tank (UST).

US EPA Region 5 and IDEM have attempted to provide a description of each agency's environmental protection activities for the period of this agreement. In most instances, IDEM's measures for determining success in accomplishing its priorities establish a 6/30/05 date or earlier for completion. IDEM's strategic goals will be updated during the next two year period. IDEM's objectives and priorities are anticipated to remain the same throughout the term of this agreement, but some adjustments may be made mid-term. IDEM will update the measures used to judge success of these priorities prior to 6/30/05. Upon approval by the Office of the Regional Administrator, these updated measures will be incorporated into this agreement by amendment. US EPA may invoke the dispute mechanism and ultimately terminate this agreement if updated measures are not approved by US EPA. In addition, there may be other environmental problems warranting action that neither agency contemplates at this time. US EPA Region 5 and IDEM agree to coordinate our activities during the agreement period to avoid overlap and duplication of effort in addressing new concerns and issues that arise. Furthermore, we recognize that this agreement does not necessarily encompass every relationship between IDEM and US EPA Region 5, and that some agreements and relationships will be described in program specific documents elsewhere. Agreements that are in place between US EPA Region 5 and other Indiana state agencies are not included in this agreement. This agreement does not replace or supersede statutes, regulations, or delegation agreements entered into previously with the state.

1. Indiana's Environmental / Strategic Goals

Indiana and US EPA are in the process of updating the appropriate agency's Strategic Goals. Finalized goals should be ready by 6/30/05.

2. Indiana's Priorities

2.1. IDEM Agency-Wide Priorities

Within IDEM's Strategic Goals and Objectives goals, we have identified five agency-wide priorities on which IDEM will focus during the next two years. These priorities are:

Maintain Essential Environmental Services

- Agency-Wide Permit Team
- Enhance the Rulemaking Process
- Internet Public Notice Standardization
- Enhance IDEM's Compliance/Enforcement Team

Coalition Building

- Build upon Information Infrastructure
- Focus on Concentrated Animal Feeding Operations
- Explain New Attainment/Nonattainment Designations
- Reduce Environmental Asthma Triggers
- Address Multi-State/Multi-Agency Environmental Issues
- Environmental Education
- Partner with Universities on Research and Technical Issues
- Expand Environmental Education Communication with Legislators and Indiana Businesses
- Heighten Agency Profile throughout Indiana

Prioritize Services and Programs

- Prioritize Office of Air Quality Services and Programs
- Prioritize Office of Land Quality Services and Programs
- Focus Internal Resources to Address Most Significant Water Quality Issues
- Prioritize Office of Pollution Prevention & Technical Assistance Services and Programs

Reducing Key Environmental Threats

- Address Issues of Homeland Security
- Address the Need to Reduce Other Environmental Risks
- Address Mercury Issues
- Toxics Assessment Project at School 21 in Indianapolis
- Address Children's Environmental Health, Including Asthma Triggers
- Integrated Pest Management
- Enhance Diesel Emissions Reduction Efforts
- Focus on Potential Environmental Threats in Indiana's Schools

■ Environmental Justice

Building a Better IDEM

- Enhance Efficiency by Leveraging Peoplesoft© Financial Management System
- Centralized Web Development
- Improve Management of Environmental Data
- Agency Data Integration/Data Management Team
- Establish Indiana Facility Registry System (I-FRS)
- Geography Network
- Document Management System (DMS)
- Focus on Records management Issues to Include Record Retention Schedules
- Workforce Development

2.1.1. Maintain Essential Environmental Services and Deliver Services in as an Efficient Manner as Practical.

Opportunities exist through changes both to processes and procedures and to organizational structure to maintain or enhance some of our critical environmental services. IDEM will focus attention on achieving efficiencies (and therefore using fewer resources) in the following areas:

Sponsor

Felicia Robinson Deputy Commissioner Legal Affairs (317) 233-3706

e-mail: frobinso@dem.state.in.us

Leads

Jim Mahern, Bruce Palin, and Sandra Jensen

1. Agency-wide Permit Team

Lead Office: OPPP/OPA

Enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Establish IDEM Permit Team, comprised of key permit managers and support managers to steer process, administrative and program improvements and efficiencies.

By:

10/1/03 - Establish Team

12/1/03 - Establish Team Workplan

1/20/04 - Implement Workplan

2. Enhance efforts to improve and streamline the rulemaking process.

A. Improve Rulemaking Process

Lead Office: OPPP/OLC

Evaluate administrative, rule writing, publication, programmatic and external aspects of rulemaking and make recommendations for revisions to current organization and management of rulemaking.

Complete evaluation

By: 10/1/03

Participate in EQSC Discussions related to rulemaking. Implement recommendations approved by Commissioner.

By: 12/1/03

B. Rulemaking Activities

Adjust rules review services and interface with programs on rulemaking activities as necessary based on legislative or managerial review of rulemaking process changes, duties and functions of agency.

Develop process manual for all rulemaking boards, in cooperation with board members and board counsels.

Revise rulemaking templates used by program rule writers for publication of rules in Indiana Register and preparation of board packets. (Revisions would reflect evolution of the information required to be provided in the documents.) Include a checkbox to ensure that pollution prevention alternatives have been considered and, when possible, added as an option to the rule. This could also include a box as a reminder to contact OPPTA for assistance in researching P2 ideas.

Develop coordination program to inform other attorneys with OLC of pending rulemaking actions.

Through: 1/31/04

3. Internet public notice standardization

Lead Office: OPA

Work with the program areas to improve and standardize methods of posting permitting decisions for public notice on the Internet.

Through: 6/30/05

Assemble a workgroup to evaluate, improve, and standardize the way public notice information for permits is posted to the Web.

By: 4/30/04

Investigate possibility of establishing a centralized/cross-program public notice website for the agency. Evaluate options and compile recommendations for next steps.

By: 9/30/04

Coordinate and implement plans devised by the workgroup.

Develop standard operating procedures (SOPs) for standardized processes developed and train affected employees and document training with HR and respective program office employee files.

By: 7/31/05 (Dependent upon decisions made by the workgroup)

4. Enhance IDEM's Compliance/Enforcement Team

The Compliance/Enforcement Team provides the base for true multi-media initiatives. These initiatives will include periodic cross media educational opportunities and open forums designed

to enable staff to identify cross media concerns and provide coordinated approaches to regulated community compliance assistance and enforcement actions. The Compliance/Enforcement Team will enhance IDEM staff's ability to identify and pursue appropriate compliance and enforcement actions through the establishment of model referrals, better coordination with IDEM's regional offices, compliance documentation and enforcement case management training, as well as information and evidence collection training.

Continue work of agency-wide Compliance Enforcement Team to meet/communicate regularly to evaluate information and formulate agency-wide compliance and enforcement strategies and resource allocation.

A. Continue Compliance/Enforcement Planning

Lead Office: OE

The C/E Team is comprised of representatives from all major agency program areas charged with multi-media compliance and enforcement planning.

a) Continue multi-media compliance and enforcement planning and coordination in accordance with current operating procedures (COP) developed by the Compliance Enforcement Team during 2000-2001. Utilize Compliance/Enforcement Planning COP and periodically revise (as needed).

Ongoing

b) Each compliance branch will work with the NWRO to come up with focused inspection and compliance goals for each of the steel mills.

Ongoing

c) Determine if and how multi-media steel mill meetings will occur. If it is decided that the meetings will be held, program offices will meet to discuss a format and content for the meetings with the steel mills.

By: 6/30/04

d) Continue development and implementation of steel mill Compliance Action Plan.

By: 6/30/04

e) Continue development and implementation of foundry sector Compliance Action Plan.

Ongoing

f) Each office will work with the NWRO to come up with goals and objectives for each of the Indiana steel mills.

By: 6/30/04 and 6/30/05

B. Improve Inspection and Enforcement Procedures

Lead Office:

Develop a model referral and referral checklist to help generate a complete and high quality referral.

By: 6/30/04

Review and evaluate the inspection process after implementing the February 4/03 COP for Conducting Single-Media Inspections.

By: 6/30/04

C. Compliance and Enforcement Sampling Operations Plan

Lead Office: OI

"Compliance and Enforcement Sampling Operations Plan" to enhance compliance sampling and monitoring as well as establish an on-call sampling operations team to respond to environmental emergencies.

By: 10/1/03 - final draft plan

3/31/04 - Agency-Wide Distribution and Implementation Training Complete

12/1/03 - First Trial Run Complete

D. Enforcement Case Development Training Program

Lead Office:

Enhance IDEM regulatory and enforcement staff knowledge of their role and responsibilities with respect to environmental enforcement.

Training Material Prepared and Presenters Identified.

By: 9/1/04 - IGCN Training complete

10/1/04 - NWRO/NRO Training complete

11/1/04 - SWRO Training complete

E. Agency-Wide Progressive Enforcement Plan

Lead Office:

- "Agency-Wide Progressive Enforcement Plan" to promote fairness and consistency in IDEM enforcement methodology while reducing duplication of effort in the following ways:
- 1) Enhanced referral and notification between the Office of Enforcement and Office of Investigations; and 2) Increasing program staff ability to identify proper referral type.

Develop plan for identifying proper enforcement response based upon violation history, culpability and/or significance of harm.

By: 7/1/04

OI Director and OE Section Chiefs meet quarterly to review plan effectiveness and revise as necessary.

Ongoing

Conduct review of referrals made to both OE and OI to identify those that should have been referred to the other.

By: 8/1/04

Utilize review findings as basis for section/branch/program specific enforcement referral training/education.

By: 12/31/04

F. Enhance and coordinate IDEM's assistance to small-regulated entities through the Compliance and Enforcement Team.

Lead Office: OPPTA

The compliance/enforcement team provides a centralized mechanism for a coordinated effort to define, implement and allocate assistance resources (i.e. financial, compliance, technical, regulatory development and regulatory outreach) for small business and other small regulated entities. The Compliance and Enforcement Team's attention to these various media efforts will lead to a more efficient use of existing resources in implementing priority assistance efforts.

G. Coordinate C/E and Compliance and Technical Assistance Program (CTAP) Programs

Lead Office: OPPTA

Develop mechanism through C/E Team to advise Compliance and Technical Assistance Program (CTAP) program on areas of regulatory compliance that are consistently not adhered to and/or areas of upcoming regulations that will impact small businesses.

By: 9/1/03

Utilize Compliance and Technical Assistance Program (CTAP) resources in developing compliance assistance tools and providing outreach on new regulations or problem areas for small businesses.

By: 7/1/05

Develop referral process to Compliance and Technical Assistance Program (CTAP) for small businesses recently inspected with findings of deficiencies that Compliance and Technical Assistance Program (CTAP) staff can assist with coming back into compliance.

By: 7/1/05

H. Stormwater Enforcement Strategy

Lead Office: OWQ

Develop a strategy for enforcing stormwater phase II requirements.

By: 9/30/04

Toxic Release Inventory

Lead Office: OPPTA

Develop a plan to encourage Toxic Release Inventory Reporters to utilize electronic reporting with the TRI-ME software. Research current number of hard copy reports submitted.

	By: 12/31/03		
Implen	nent plan		
	By: 1/31/04		
Measure effectiveness.			
	By: 7/1/05		

2.1.2. Coalition Building

To build on its mission to improve the quality of Indiana's air, land and water, IDEM will strategically reach out to Hoosiers through local communities, universities, business, agri-business, and other state agencies throughout the state. These efforts will include improvements to internal and external communications to help constituent groups understand, meet and even exceed the environmental rules and regulations that affect them.

Sponsor

Cheryl Reed Assistant Commissioner Office of Public Planning and Policy (317) 233-5965

e-mail: creed@dem.state.in.us

Leads

Karen Terrell, David Russell, and Terry Coleman

IDEM will address this issue by:

1. Building upon information infrastructure

A. Pursue federal funding to provide bi-lingual documents and/or interpreters to Latino and Hispanic Hoosiers

Lead Office:

A growing number of Indiana residents speak Spanish as a first language and have difficulty understanding important environmental information. IDEM will seek federal grant funding to provide Spanish translation services for these Hoosiers.

By: Pursuit of federal funding will be ongoing. Implementation will begin when funding is obtained.

B. Establish an on-line publication catalog/on-line IDEM "bookstore."

Lead Office: MACS

IDEM has myriad brochures, reports, other informational documents and products of interest to the public, but does not provide convenient, electronic access to that information.

To increase public awareness of these materials and to heighten awareness of IDEM's services and responsibilities, the agency will:

Create an on-line publication catalog/archive that will enable external and internal customers' access to all agency publications; and

By: On-line publication catalog -- 1/1/04

Explore creation and marketing of an on-line IDEM "bookstore" providing publications and promotional materials to expand statewide recognition of IDEM's role, services and responsibilities.

By: "Bookstore"-- 12/1/03

Explore grant sources to provide information kiosks and displays, outreach campaigns for key issues in environmental justice areas, and electronic notification systems.

By: Information services -- Pursuit of funding will be ongoing. Implementation will begin when funding is obtained.

2. Focusing on Concentrated Animal Feeding Operations (CAFOs)

Lead Office: OLQ

EPA Role: Federal Guidance Standards, oversight and review.

Help CAFOs comply with new regulations

The USEPA has adopted new CAFO regulations, which IDEM will enforce via a new National Pollutant Discharge Elimination System (NPDES) general permit rule.

To help Indiana producers understand and comply with the new regulations, IDEM will expand communication and marketing efforts to agricultural sector by:

Increased communication with agriculture and mainstream media through educational materials, fact sheets that will be used to reinforce agency's message regarding proper agricultural operations and to explain IDEM's rules and regulations.

Ongoing through 6/30/05

Increased direct communication among agricultural community, IDEM, and Office of the Commissioner of Agriculture.

Ongoing through 6/30/05

Providing environmentally friendly Nutrient Management Education materials to livestock producers.

Ongoing through 6/30/05

3. Explaining new attainment/nonattainment designations

Lead Office: OAQ

EPA Role: Provide guidance on designation and implementation issues.

Explain new designations

New federal attainment/nonattainment designations are being developed throughout the nation to comply with federal law. These new designations will likely require some Indiana communities to take remedial action.

To help explain these new designations and potential actions, IDEM will:

Conduct public meetings, provide materials, and seek input to educate the public about the changes.

Ongoing

Submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA

By:

Fine particle designations - 12/31/03 or other date established by USEPA
Ozone recommendations - 7/15/03

4. Reducing environmental asthma triggers

Lead Office: OPA/OAQ

EPA Role: Grant funding. Advisor to the Environmental Quality Workgroup.

Work with InJAC to reduce asthma effects on children

IDEM will work with its co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees. IDEM will:

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems.

By: 10/31/03

Work with the Environmental Quality committee to access information and evaluate the environment in Indiana, using available information, to develop recommendations to identify known and potential indoor/outdoor environmental triggers for asthma, and to identify strategies and develop tools for organizations to reduce exposures to asthma triggers

By: 6/30/05

Establish a comprehensive plan to reduce the burden of asthma in four sets of age groups of children: reduce encumbrance of asthma for children; and develop a comprehensive asthma surveillance system for each of the four age groups.

By: 6/30/05

Develop educational material regarding environmental triggers of asthma and distribute to childcare facilities and other interested parties.

By: 6/30/05

5. Addressing multi-state/multi-agency environmental issues

Lead Office: OI

Build on cross jurisdictional enforcement

IDEM has worked for many years to forge relationships with the Environmental Crimes Task Force (ECTF), EPA Criminal Investigation Division (CID), Indiana Department of Natural Resources (IDNR), US Department of Transportation (DOT), local prosecutors and various other federal, state and local offices and agencies, as well as with the Midwest Environmental Enforcement Association, to effectively address multi-state/multi-agency environmental issues.

IDEM will enhance its cooperative work with outside organizations to:

Provide cost-effective training for IDEM regulatory staff, attorneys, investigators and county prosecutors through MEEA.

Ongoing through 6/30/05

Continue to actively participate in Environmental Crimes Task Force (ECTF), Indiana Department of Natural Resources (IDNR) and EPA Criminal Investigation Division (CID) meeting.

Ongoing through 6/30/05

Review all complaints and referrals received for potential involvement of other agencies

Ongoing through 6/30/05

6. Environmental Education

A. Build on environmental education efforts

Lead Office: OPA

EPA Role: Funding, guidance

IDEM will continue to build on its efforts to educate citizens about environmental issues and ways to become involved in environmental protection.

The agency will accomplish this by:

Expanding IDEM's education and outreach efforts by encouraging environmental experts, including staff chemists, geologists, and other scientists to make school presentations as partners with OPA's Education Team.

By: 6/30/05

Coordinating IDEM school presentation resources and materials, including Earth Week presentation kits and IDEM exploration books.

By: 6/30/05

Assisting in outreach events, such as, Earth Day Indiana, the Hoosier Association of Science Teachers (HASTI) convention, the Indiana Youth environmental Summit (IYES), the Indiana State Fair, and Indiana Recycling Coalition (IRC) education sessions.

Ongoing

Developing and distributing information regarding mercury, asthma, and child care facility programs to children, parents, and educators.

Ongoing

Distributing home self-assessment booklet and IDEM supplement for potentially harmful items found in the home to citizens and schools.

By: 6/30/05

B. Recycling education

Lead Office: OPPTA

Continue educating students, teachers, consumers, public officials and businesses about the benefits of recycling and related source reduction activities through presentations, publications, guidance documents and technical assistance programs.

By: 6/30/03

Conducting an illegal burning workshop for public officials in partnership with groups like Southern Indiana Recycling Initiative (SIRI), Northern Indiana Recycling Initiatives (NIRI), Association of Indiana's Solid Waste Management Districts (AISWMD), and Indiana Association of Cities and Towns (IACT).

By: 6/30/05

7. Partnering with universities on research and technical issues

Lead Office: OPPTA

Establish Industrial Pollution Prevention Internships

Work with Human Resources to consider the development of an internship program with OPPTA/CMTI. Work with Clean Manufacturing Technology Institute (CMTI) to evaluate the possibility of a college pollution prevention internship program. This program would allow engineering students to assess participating facilities for pollution prevention opportunities.

By: 6/30/04

8. Expanding environmental education communication with legislators and Indiana businesses

Lead Office: OBLR

To help legislators better understand the complexity of environmental regulations; IDEM will expand its education efforts in this area by:

Planning at least 10 educational visits with legislators in their districts, including touring wetlands, agricultural operations, wastewater treatment facilities and other environmental-related programs.

Meeting with at least half of the environmental affairs committee members of the House and Senate, visiting a priority environmental concern or success in their district.

Planning an educational forum as part of the Environmental Quality Service Council where IDEM program staff will explain their roles and responsibilities.

Holding meetings with environmental representatives and leaders of business, industries and municipalities across the state that could include touring a steel plant, power plant or a wastewater treatment plant.

Ongoing during May – December 2003 and 2004

Developing relationships with business and industry organizations through one-on-one interaction.

Ongoing

Working with the Compliance and Technical Assistance Program and IDEM program areas to assist Indiana's businesses with compliance questions, permits and technical assistance.

Ongoing

Working closely with the Indiana Department of Commerce's Business Ombudsman and IDEM's Office of Pollution Prevention and Technical Assistance to encourage new and existing companies to comply with environmental regulations.

Ongoing

Making special efforts to contact endangered industries, such as foundries, which are declining in the state, by providing compliance assistance, and technical and permit assistance.

By: 12/31/03

9. Heighten agency profile throughout Indiana

Lead Office: OCR

Expand community outreach

IDEM participates in or hosts several community events each year, such as the Governor's Conference on the Environment, Indiana State Fair, Black Expo, Earth Day, Earth One Festival, etc. IDEM also interacts with local elected officials (i.e. Mayors, Town Council Presidents) to educate, assist and update them on various environmental issues that affect their community.

IDEM will identify new opportunities to promote the agency and its services constituent groups by:

Participating in additional community festivals and appropriate events.

Expanding its Speakers Bureau services and promoting that service statewide.

Maintain relationships and develop new relationships with local elected officials in order to assist local communities on various environmental issues.

Through: 6/30/05

2.1.3. Prioritize Services and Programs to Achieve the Greatest Improvement in Air, Water and Land Quality

The Offices of Air Quality, Water Quality, Land Quality, Pollution Prevention and Technical Assistance, and all support offices will prioritize assignments, wherever discretion is available, in permitting, compliance, enforcement, assistance, rulemaking, monitoring environmental quality and other functions that will achieve the greatest benefit in improving air, water and land quality.

Each Office will ensure that its priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting environmental quality across the state.

Sponsor

Tim Method
Deputy Commissioner
Environmental Results
(317) 233-3706
e-mail: tmethod@dem.state.in.us

Leads

Janet McCabe, Jim Mahern, Mary Ellen Gray, and Bruce Palin

Each Office will:

- 1. Designate managers in each major program area for overall responsibility to prioritize the area's work (probably branch chiefs, but could be others in some circumstances.)
- 2. Conduct a semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection. This review should include a semi-annual presentation and discussion among the office's senior management. Adjustments to work plans will be made as indicated by this review and coordinated with scheduled EnPPA updates.
- 3. Program areas within the offices that currently have formal systems in place to prioritize work (e.g. the Compliance Monitoring System in the Office of Air Quality) shall employ those systems to set priorities and annually assess whether the systems need adjustment.
- 4. Program areas that do not have such systems in place will develop criteria for setting priorities and develop at least an informal structure for setting priorities.
- 5. These regular evaluations will consider available resources, changing state and/or federal directives, and multimedia or cross-office implications.

1. Prioritize Office of Air Quality Services and Programs

EPA Role: Work with IDEM to remove barriers to issuance of individual Title V permits, for example for facilities with pending federal enforcement actions. Assist with technical and legal questions, especially with major source permits.

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Lead Office: OAQ

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Issue all Title V permits to sources whose applications were submitted prior to June 30, 2002.

By: 12/31/03

Meet all mandated permit deadlines 100% of the time.

Ongoing

2. Prioritize Office of Land Quality Services and Programs

Lead Office: OLQ

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

3. Focus Internal Resources to Address Most Significant Water Quality Issues

Lead Office: OWQ

EPA Role: Conduct an initial review and then periodically review to ensure that all areas of the Office are focused on highest, best use of staff time and resources to gain water quality improvements and most critical services to citizens.

Ensure that OWQ Priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting the water quality across the state.

Conduct a semi-annual review of OWQ activities to ensure that all work continues to be prioritized to provide efficient/effective services and is oriented toward making a significant difference in water quality improvement and protection. The review will include, at a minimum, a presentation by each branch chief on current activities and any planned changes to those activities to the OWQ senior management team. Adjustments as necessary will be made by the team.

By: 7/1/03 and biannually thereafter

4. Prioritize Office of Pollution Prevention and Technical Assistance Services and Programs

Lead Office: OPPTA

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

2.1.4. Reducing Key Environmental Threats

As federal officials continue to advise Americans of the dangers that exist throughout the country, and the world, IDEM is working to ensure Hoosiers are protected from bio-terrorism activities and associated environmental hazards while also expanding its efforts to reduce other environmental risks.

Sponsor

Dana Reed-Wise Chief of Staff (317) 233-3043

e-mail: dreedwis@dem.state.in.us

Leads

Mary Ellen Gray and Paula Smith

As part of its goal to keep Hoosiers from harm, IDEM will address issues of homeland security by:

1. Filling a newly created position dedicated to drinking water security and infrastructure protection.

Lead Office: OWQ

The Office of Water Quality Security & Counter-Terrorism Coordinator will work in concert with key staff in the Office of Land Quality and the Office of Air Quality, as needed, to ensure that the agency participates effectively in the counter-terrorism efforts.

Ongoing

Coordinate IDEM's interactions with other federal, State and local agencies on matters relating to security and infrastructure protection.

Ongoing

Be the point of contact for matters relating to drinking water and wastewater infrastructure security.

Ongoing

2. Coordinating with the State Emergency Management Agency to develop and implement emergency response plans.

a) Involvement in multi-agency counter-terrorism and hazmat response forums and the State Emergency Management Agency advisory committee

Lead Office: OLQ

Participate in multi-agency counter-terrorism and hazmat response forums (Counter-Terrorism and Security Council, Safe Schools Advisory Council, Purdue University Homeland Security Institute, U.S. EPA Region 5 Regional Response Team.)

Provide staff and support to the Indiana Emergency Response Commission

Provide after hour's duty roster of IDEM staff to State Emergency Management Agency for staffing the State Emergency Management Agency's Emergency Operations Center.

Participate in State Emergency Management Agency advisory committee regarding Federal Emergency Management Agency and Department of Justice counter-terrorism grants.

b) Counter-terrorism response plans

Lead Office: OLQ

Participate in developing and updating multi-agency counter—terrorism response plans and all hazards plans. (Indiana State Agency Comprehensive Emergency Management Plan, U.S. EPA Area Contingency Plans for Indianapolis and Louisville, Board of Animal Health Foreign Animal Disease Plan, Indiana Continuity of Government Plan)

During: FY 2003 – 2005

c) Counter-terrorism and hazmat response and recovery exercises

Lead Office: OLQ

Contribute to the design and participate in local, state, and federal counter-terrorism and hazmat response and recovery exercises. (Chemical Stockpile Emergency Preparedness Plan (CSEPP (VX)), Operation River City (Louisville), Hoosier Guardian, Local Emergency Planning Committee exercises, Pipeline Group tabletops).

d) Drinking water system response protocol

Lead Office: OWQ

Coordinating with the State Emergency Management Agency to develop a drinking water system response protocol that will be incorporated into Indiana's Statewide Comprehensive Emergency Management Plan. The response protocol will be designed to address two important aspects of emergency planning and response. First, the protocol will address how specifically the State will respond to an incident, real or threatened, at a public water system. The second portion of the protocol will deal with the decision making process for determining what to communicate to the public and what steps to take regarding the safety and use of the drinking water based on the findings of the initial investigation.

By: 1/31/04

3. Vulnerability assessments and emergency response planning

Lead Office: OWQ

Training drinking water staff, waste water staff, emergency response staff, Indiana Department of Health, and State Emergency Management Agency staff in performing vulnerability assessments and emergency response planning.

Provide assistance to community drinking water systems serving over 3,300 population in meeting federal requirements. Report number of systems assisted quarterly.

Ongoing through 6/30/05

Provide assistance to community drinking water systems serving less than 3,300 population and non-community systems. Report number of systems assisted quarterly.

Provide assistance/training to 25 wastewater systems. Report number of systems assisted quarterly.

Ongoing through 6/30/05

4. Reduce the potential for bioterrorism

Lead Office: OWQ

Working with existing programs such as wastewater, hazardous waste, confined feeding and drinking water to develop strategies to protect existing facilities, reduce the potential for bioterrorism and ensure that there is an effective response should an incident occur.

Ongoing through 6/30/05

5. Records Management

Lead Office: OLC

Ensure records currently considered public and to be disclosed upon request do not enhance opportunities for terrorist strikes.

Ongoing

6. Risk Advisory Committee

Lead Office: OPA

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Through: 6/30/05

Lead by IDEM's Office of Planning and Assessment, IDEM program offices (specifically, Office of Air Quality, Office of Water Quality and the Office of Pollution Prevention and Technical Assistance, will work to:

Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list.

By: 12/30/03

Develop a process to make better risk-based decisions and allocation of resources.

By: 6/30/04

Assist other IDEM offices in addressing their priority contaminants.

By: 6/30/05

Participate in agency-wide meetings.

Through: 6/30/05

7. Risk Integrated System of Closure

Lead Office: OLQ

Continue to coordinate and implement recommendations from the Risk Advisory Committee on toxics reduction efforts across the agency.

Institutionalize the Risk Integrated System of Closure policy (i.e. Project Manager and Technical staff training, additional resources for Risk Integrated System of Closure reviewers).

```
By: 6/30/04 and 6/30/05
```

Evaluate reallocating more staff resources to completing Risk Integrated System of Closure reviews.

```
By: 6/30/04 and 6/30/05
```

Evaluate current Risk Integrated System of Closure manuals for improved clarity and organization in an effort to provide complementary manuals that are user friendly.

```
By: 6/30/04 and 6/30/05
```

Improve coordination with all sister agencies who have tasks related to Risk Integrated System of Closure in an effort to define roles and responsibilities for greater resource efficiency.

```
By: 6/30/04 and 6/30/05
```

Develop and implement timeframe for finalizing the Total Petroleum Hydrocarbons and Vapor Intrusion policies.

By: 6/30/04 and 6/30/05

8. Address Mercury Issues

Lead Office: OPA/OAQ

As an agency, IDEM will focus on:

Implementing recommendations for next steps to reduce mercury emissions.

```
Through: 6/30/05
```

Developing overall multi-media mercury reduction plan, identifying the various mercury "loads".

```
Through: 6/30/05
```

Continuing implementation of the mercury deposition monitoring project and analysis of data in coordination with United States Geological Survey and issue final report.

Through: 6/30/05

A. Mercury Inventory and Data Analysis

Gather and analyze mercury data to provide key information to guide IDEM's mercury water quality planning efforts, a part of a regional and local strategy. Data would include the United States Geological Survey/IDEM mercury monitoring project, trace metals sampling in surface water, and fish tissue sampling data.

List Mercury (Hg) reduction actions/projects IDEM has already taken.

By: 10/31/03

Get latest (2000) Regional Air Pollutant Inventory Development System (RAPIDS) (EPA) data and analyze it to compare with 1997 and 1999 RAPIDS data (this data is released biennially).

By: 10/31/03

Assess impact of more stringent federal rules on medical waste incinerators.

By: 12/31/03

Chart United States Geological Survey data and Cross reference United States Geological Survey data with IDEM data.

By: 9/30/04

Gather available data on reported Hg discharges from Indiana publicly owned treatment works (POTWs).

By: 6/30/05

In conjunction with the wastewater triennial review, determine, as fully as possible, the various sources of Hg in the influent of publicly owned treatment works.

By: 12/31/04

B. Mercury Exposure and Education

Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Ongoing through 6/30/05

C. Mercury Thermostat Reduction & Recycling Program

Continue to promote and manage the thermostat program and attend HVAC-R (heating, ventilation, air conditioning and refrigeration) association meetings.

Through: 6/30/05

Conduct annual outreach to the thermostat program participants to ensure they are properly serviced by the Thermostat Recycling Corporation and that they have an adequate supply of IDEM promotional materials.

By: 6/30/04 and 6/30/05

D. Dental Mercury Program

Work with the Indiana Dental Association, the Indiana State Department of Health, and other interested parties to develop environmental best management practices for Indiana dentists. In addition to mercury, these practices will address lead and silver.

By: 6/30/04

Working with the Indiana Dental Association, and the Indiana State Department of Health, conduct outreach to Indiana Dentists to assist them in following environmental best management practices. This may include site visits, providing information, and/or developing guidance documents.

By: 10/31/04

Work with the Indiana Solid Waste Management Districts (SWMDs) to coordinate the proper management of dental waste. Assist participating dentists with finding proper vendors for their waste.

Through: 6/30/05

E. Mercury Deposition Monitoring

Continue and complete implementation of mercury deposition monitoring project; complete analysis of data in coordination with United States Geological Survey, issue final report.

Through: 6/30/05

F. Mercury Switch Removal

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

G. Mercury & Schools

Lead the school mercury reduction and recycling pledge program. Conduct outreach campaign and offer assistance to schools, Solid Waste Management Districts, and the City of Indianapolis where needed.

Through: 6/30/05

9. Enviro-School Program

EPA Role: Provide funding and guidance.

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

Through: 6/30/05

10. Continue toxics assessment project at school 21 in Indianapolis by conducting monitoring activities, other grant activities and issuing final report.

EPA Role: Assist with oversight of federal grant, provide technical assistance on risk characterization activities and interpretation of monitoring data.

Lead Office: OAQ

Lead Office: OPA

School 21 (Indianapolis) Toxics Assessment Project. Conduct monitoring activities, complete other grant activities and issue final report.

By: 8/30/04

11. Address Potential Environmental and Health Threats in Homes and Communities

Lead Office: OPA

Expand the Children's Health Program:

Partner with the Indiana State Department of Health and Indiana Family Social Services Administration to expand the Children's Health Program on areas such as asthma triggers, integrated pest management practices, lead prevention to include sensitive populations located in long-term care facilities, hospitals and rehabilitation centers.

By:12/1/04

12. Integrated Pest Management (IPM)

Lead Office: OPA

Work with schools and child care facilities and the Indiana Family and Social Services Administration to implement the Integrated Pest Management model that was developed from the pilot project.

Ongoing through 6/30/04

Integrated Pest Management curriculum

Publish Integrated Pest Management curriculum

By: 6/30/05

Conduct outreach to childcare facilities and schools

By: 6/30/05

13. Reduce Diesel Emissions

Lead Office: OAQ/OPA

Enhance diesel emissions reduction efforts by working to develop and implement projects to reduce emissions from diesel sources, including school bus anti-idling pilots, school bus and/or municipal fleet retrofit projects, truck stop electrification project and development of web-based diesel emissions resource center.

- Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

- Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

- Develop and distribute marketing materials for this volunteer program.

Lead Office: OPPP

By: 6/30/05

- Investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

- Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

- Complete the Idleaire truckstop electrification project.

By: 6/30/04

14. Environmental Justice

Under IDEM's Environmental Justice Initiative, IDEM is committed to ensuring that no citizen or community within the State of Indiana, regardless of race, color, national origin, income, or geographic location, will bear a disproportionate share of the risks or consequences of environmental pollution or will be denied equal access to environmental benefits. IDEM has established the Indiana Environmental Justice Advisory Committee to assist IDEM in the implementation of its environmental justice strategic plan and environmental justice principles in all of our programs.

IDEM will continue to address environmental justice by:

A. Obtaining and integrating demographic and environmental data currently available at IDEM, along with available relevant data from other agencies, and making it available and understandable for communities.

The EJ Team will update maps and provide information to the Indiana Environmental Justice Advisory Committee, and maintain current information on the web site.

Ongoing through 6/30/05

Working with programs across the agency, and with other state agencies, for opportunities to conduct workshops for communities and stakeholder groups to educate them about IDEM, environmental issues, permitting, and public participation opportunities.

Integrate Permit Guide and IDEM's Guide for Citizen Participation.

By: 10/31/03

Developing a customized training model for staff to increase their understanding and sensitivity to environmental justice issues.

The Environmental Justice Team will establish a second round of environmental justice training focusing on how the agency can incorporate environmental justice principles in their work. The training will also focus on current environmental justice activities.

By: 12/31/03

The Environmental Justice Team will begin conducting the second round of environmental justice training.

By: 12/31/04

Researching successful mediation programs in other states with the goal of implementing a program for Indiana citizens to actively interact to resolve environmental disputes.

By: 12/31/03

B. Provide outreach for Environmental Justice Program

Lead Office: OCR

EPA Role: Provide guidance

IDEM will build on its EJ program by convening regular meetings of the Indiana Environmental Justice Advisory Committee, which will include members from various state agencies to provide a comprehensive approach to environmental justice solutions.

By: 12/31/03

2.1.5. Building a Better IDEM

To continue the agency's focus on improving our work environment and assuring that our core work is completed efficiently and effectively. IDEM will focus on work place advancements, enhance the way we manage environmental information, and continue to improve our functional efficiencies.

Sponsor

Susan Moster
Deputy Commissioner
Environmental Operations
(317) 233-0006

e-mail: smoster@dem.state.in.us

Leads

Environmental Information: Laurie Beamish and Ryan Pastorius

Workforce Development: Brandye Hendrickson and Dan Hottle

IDEM will address:

1. Enhance Efficiency by Leveraging PeopleSoft© Financial Management System

Lead Office: OMBA-

Study all currently available modules and features of the PeopleSoft Financial Management System specifically including contracts, workflow, projects, and time and labor, to determine if additional capabilities can result in greater efficiencies for IDEM processes.

Study Financial Management Information System

Study all currently available modules and features of the PeopleSoft Financial Management System to determine if additional features or modules can result in greater efficiencies for IDEM processes.

By: 4/1/04

Report on the results of the study of all currently available PeopleSoft features and make recommendations to Senior Staff on any additional features that should be further pursued.

By: 6/1/04

Develop an implementation proposal for any features that were recommended for implementation. This proposal will include any changes to current business practices that will be needed to implement the additional features or modules of PeopleSoft.

By: 9/1/04

Present any implementation proposals to senior staff and begin the implementation process for any proposals that are approved.

By:10/1/04

2. Centralized Web Development

Lead Office: MACS / OMBA-BSD Centralize Web site development/maintenance to integrate program area web pages. This will require the creation of a Web Technical Team. The team will work in concert with Office of Management and Budget Administration – Information Technology staff to ensure that pages are brought to USC § 508 compliance standards.

Create a centralized Web development and management team with defined standard operating procedures and expectations.

By: 6/1/04

Realign agency Web site to re-evaluate and re-organize information by removing old information, updating Web pages and restructuring information to increase external customers' ease of use and navigability.

By: 6/1/05

Create a location for internal customers and populate with information and guidance documents.

By: 12/31/04

Establish Web site development tools and feedback mechanisms that allow customers to provide input to future site design.

By: 12/31/03

Create and migrate Web site to new common look with input from external customers and focus groups.

By: 6/30/05

Integrate agency site development with statewide Web initiatives.

Ongoing

Create an on-line publication catalog/archive that will enable external and internal customers' access to all agency publications.

By: 6/30/05

3. Improve management of environmental data, and build foundation for future data integration efforts:

Lead Office: OPA/OMBA-BSD

- Indiana Facility Registry System (I-FRS)
- Geography Network
- Document Management System (DMS)
- Other Office/Data Specific integration efforts

Agency Data Integration / Data Management Team

Continue efforts of the Data Management Team. The Team ensures that new and enhanced data integration projects are consistent with guiding data management policies. The team also develops and, throughout their office, proactively implements standards pertaining to data management.

Ongoing through 6/30/05

Establish Indiana Facility Registry System (I-FRS)

Staff from the Office of Management and Budget Administration (OMBA) Information Technology section and the Office of Planning and Assessment (OPA) will oversee development of, and will implement the Indiana Facility Registry System (I-FRS) to facilitate the exchange of facility data between IDEM and EPA and promote quality environmental data.

Due Date / Through: 6/30/05

Geography Network

Each Office will inventory existing Geographic Information System (GIS) data.

By: 6/30/03

Agency Geographic Information System (GIS) Coordinators, with assistance and input from Agency GIS Tech Workgroup composed of Office Geographic Information System (GIS) data Contacts, will develop plan for creating metadata for program developed data.

By: 10/1/03

Information Technology Geographic Information System (GIS) staff will develop Geography Network service on IDEM Intranet ArcIMS Server

By: 12/31/03

IDEM Geography Network made available to State Government Network

By: 3/31/04

Document Management System (DMS)

Deploy DMS in 25% of the Agency

By: 8/31/03

Deploy DMS in 50% of the Agency

By: 1/31/04

Deploy DMS in 75% of the Agency

By: 8/31/04

Deploy DMS in 100% of the Agency

By: 12/31/04

Focus on records management issues to include record retention schedules.

Develop and implement a retention schedule and agency policy for the electronic filing of e-mails. This will assist with reducing the time and effort currently expended for Public Information requests as well as court requests for e-mail.

Develop record retention policy (including e-mails and electronic documents)

By: 12/31/03

4. Workforce Development

Focus on Supporting Our Workforce

Facilitate management panel discussions/focus groups to encourage management participation.

As new agency policies are developed, Human Resources will solicit input from managers.

By: 12/31/03

Hold employee sounding sessions and manager open forums.

As new policies and procedures are distributed, Human Resources will hold sounding sessions and open forums where information can be exchanged and questions can be answered.

By: 12/31/03

Research options for conducting "360-degree" evaluations.

Human Resources will research available software, other agencies' procedures and ways to give effective feedback to supervisors.

Due Date: 6/30/04

Succession Planning

Develop internal leadership training.

Human Resources will research and provide options to Senior Staff for leadership training.

Options researched by 12/31/03 First session held: by 12/31/04

Develop knowledge retention system to deal with employee turnover and retirement.

Human Resources will develop a tool for supervisors to help capture the patterns, processes and skills of high performing employees to prevent loss of valuable knowledge upon resignation or retirement.

Tool developed:

By 6/30/04

Communication Training

Establish a media plan for emergency management and crisis communications to enable the agency to efficiently and effectively respond to the news media in the event of an environmental crisis. Identify IDEM crisis communication message themes and strategies for quickly responding to reporters and assign appropriate senior staff and management crisis team personnel.

Assign appropriate senior staff and management crisis team personnel.

By: 9/1/03

Complete and distribute crisis plan

By: 12/1/03

Review crisis team personnel list every six months and update as necessary.

Create scenario-driven media training plan to prepare IDEM officials for conducting interviews with members of the news media; train for appropriate agency staff.

Complete media training plan.

By: 9/1/03

Train 100% of senior staff.

By: 1/1/04

Train 75% of agency Branch Chiefs.

By: 4/1/04

Work with IDEM Human Resources to make media training course available to all appropriate IDEM managers on the Quarterly Training Calendar.

Provide public speaking training to appropriate agency staff.

Train 50% of Speaker's Bureau personnel

By: 8/1/04

Implement any potential organizational changes to enhance efficiencies.

Human Resources will work with program areas to review organizational structures and provide guidance on potential reorganization packages.

Guidance accessible

By: 12/31/03

5. Expand Health and Safety Training

Explore possibility of expanding in-house 8-hour training.

Establish training curriculum relevant to Office of Water Quality, Office of Air Quality, Office of Pollution Prevention and Technical Assistance, and the Office of Legal Counsel for in-house training programs.

By: 9/1/03

Implement in-house training of new curriculum.

By: 1/1/04

Develop "train-the-trainer" curriculum for in-house First Aid/CPR training.

- Train 25% of field staff in First Aid/CPR.

By: 6/30/03

- Offer training for non-field staff in First Aid/CPR.

By: 10/1/03

- Compile and disseminate security and personal safety information.
- Conduct informational sessions to discuss relevant building security and emergency preparedness in all IDEM locations.

By: 10/1/03

- Review and revise Emergency Action Plans for all locations to address concerns recognized from staff during informational sessions.

By: 12/31/03

- Disseminate updated Emergency Action Plans to all staff.

By: 2/28/04

- Continue involvement in Indiana Government Center Core Team for emergency preparedness to ensure that the Agency's plan is consistent with the campus plan.

By: 5/31/04

6. Address Quality Issues (Quality Management Plan)

Lead Office: OPA

EPA Role:

- * EPA Region 5 will provide the IDEM Quality Assurance Manager with relevant information about quality related issues; act as coordinator and conduit for Region 5 State Science Council research and educational activities; and provide guidance on implementing peer review policies and procedures.
- * EPA Region 5 will provide guidance on the use of quality assurance tools and procedures required to evaluate the effectiveness of IDEM's quality system, as well as having a role in actually monitoring and assessing IDEM's quality system and Quality Management Plan.

Continued implementation of management and technical quality assurance and quality control policies and procedures throughout the agency as described by the agency Quality Management Plan (QMP).

Ongoing through 6/30/05

Quality Assurance (QA) assessment of IDEM's quality system and Quality Management Plan to include expansion of IDEM Quality Assurance Team and hold at least quarterly meetings; develop implementation and assessment phase policies and procedures for ensuring consistency of quality assurance practices throughout the agency; perform annual Quality Management Plan and Quality System review and report to IDEM management and EPA Region 5; and develop a plan and timeline for performing other technical and management assessment processes throughout IDEM program offices.

Ongoing though 6/30/05

Management of quality-related documents, to include the tracking of Quality Assurance Project Plans (QAPPs), in the agency Quality Assurance Project Plan Tracking Database; the listing of Standard or Current Operating Procedures (SOPs/COPs), as well as the listing of the myriad of other technical, guidance and non-rule policy documents used within the agency; and identify any 'new' quality-related documents, grants, contracts, and programs that must be referenced in the agency Quality Management Plan.

By: 6/30/05

Communicate quality-related information by participating in monthly or bimonthly meetings with Region 5 State Science Council. Per our commitment in the Quality Management Plan, participate in the IDEM 'peer review' panel that will be assembled to develop agency-wide policies and procedures to review and approve study plans and reports for major special studies and other technical documents for publication and distribution. An agency-wide peer review policy and implementation timeline will also be developed.

Ongoing though June 30, 2005

7. Develop IDEM Strategic Plan

Lead Office: OPA

Develop/refine a new strategic plan for IDEM to guide future agency initiatives.

By: 6/30/04

2.2. IDEM Office Priorities

1.1.1. OFFICE OF AGRICULTURAL RELATIONS	43
1.1.1.1 Office Priorities	43
1.1.2. OFFICE OF AIR QUALITY	45
1.1.2.1. AGENCY PRIORITIES 1.1.2.2. OFFICE PRIORITIES 1.1.2.3. BRANCH PRIORITIES 1.1.2.4. OFFICE SUPPORT	49 52
1.1.3. OFFICE OF LEGISLATIVE AND BUSINESS RELATIONS	65
1.1.3.1. AGENCY PRIORITIES	
1.1.4. OFFICE OF COMMUNITY RELATIONS	68
1.1.4.1. AGENCY PRIORITIES	68
1.1.5. OFFICE OF INVESTIGATIONS	69
1.1.5.1. AGENCY PRIORITIES	69
1.1.6. OFFICE OF ENFORCEMENT	72
1.1.6.1. AGENCY PRIORITIES	72
1.1.7. OFFICE OF LAND QUALITY	76
1.1.7.1. AGENCY PRIORITIES 1.1.7.2. OFFICE PRIORITIES 1.1.7.3. REMEDIATION BRANCH PRIORITIES 1.1.7.4. PERMITS BRANCH PRIORITIES 1.1.7.5. COMPLIANCE AND RESPONSE BRANCH PRIORITIES 1.1.7.6. SCIENCE SERVICES BRANCH PRIORITIES 1.1.7.7. RULES, PLANNING AND OUTREACH SECTION PRIORITIES	79 81 85 86
1.1.8. OFFICE OF LEGAL COUNSEL	91
1.1.8.1. AGENCY PRIORITIES	91
1.1.9. OFFICE OF MANAGEMENT, BUDGET, AND ADMINISTRATION	92
1.1.9.1. Office of Fiscal Policy and Accounting	92
1.1.10. NORTHERN REGIONAL OFFICE	99
1.1.10.1. Office Priorities	99
1.1.11. NORTHWEST REGIONAL OFFICE	101
1.1.11.1. Office Priorities	101
1.1.12. OFFICE OF PLANNING AND ASSESSMENT	103
1.1.12.1. AGENCY PRIORITIES 1.1.12.2. OFFICE PRIORITIES	
1.1.13. OFFICE OF POLLUTION PREVENTION AND TECHNICAL ASSISTANCE	121
1.1.13.1. AGENCY PRIORITIES 1.1.13.2. OFFICE PRIORITIES 1.1.13.3. OPPTA – BRANCH SPECIFIC PRIORITIES	124

1.1.14. SOUTHWEST REGIONAL OFFICE	13
1.1.14.1. Office Priorities	13
1.1.15. OFFICE OF WATER QUALITY	134
1.1.15.1. AGENCY PRIORITIES	132
1.1.15.2. Office Priorities	13°

2.2.1. Office of Agricultural Relations

The Office of Agricultural Relations serves as a liaison between the agricultural community and IDEM. Working closely with agricultural community leaders as well as individual farmers, the office provides educational information and assistance regarding environmental regulations and policy to

David Russell Director

Office of Agricultural Relations

phone: 232-8587

e-mail: drussell@dem.state.in.us

members of the agricultural community. The office contributes to the development of policy and rules affecting the agricultural community and assists the community with compliance matters.

The office has focused on ongoing federal and state issues concerning livestock production operations for the past several years as the agency developed Confined Feeding Regulations, which became effective in March 2002 after lengthy discussion and debate. Follow-up education and continued discussion will be necessary.

As part of its compliance responsibility, the office makes frequent farm visits and conducts educational outreach to help farmers comply with environmental rules and regulations to preclude the need for agency enforcement.

2.2.1.1. Office Priorities

Expand Communication and Marketing Efforts

PPG (Y/N): N

EPA Role: completion of EPA guidance by Spring 2003

Will increase communication with agriculture and mainstream media regarding agricultural issues by developing proactive news releases, letters to the editors, news columns and other publications regarding agricultural issues.

Will build on direct communications efforts with agricultural community and Office of the Commissioner of Agriculture.

Will create and distribute educational materials, fact sheets that can be used by office, as well as third party sources, to reinforce agency's message regarding proper agricultural operations and to explain complicated agency rules and regulations.

Ongoing

Nutrient Management Education for livestock producers

PPG (Y/N): N

EPA Role: review

Will create and distribute user friendly educational materials, fact sheets that can be used by office, as well as third party sources, to reinforce agency's message regarding proper agricultural operations and to explain complicated rules and regulations.

By: 8/1/03

Storm water Rules

PPG (Y/N): N

EPA Role: review

Will continue to work with the Office of Indiana State Chemist and Office of Commissioner of Agriculture to develop and explain agricultural component of storm water rules.

Ongoing

Communicate Agricultural Issues

PPG (Y/N): N

EPA Role: Participate in quarterly calls.

OAR will coordinate quarterly calls with EPA to discuss agricultural issues affecting the identified Indiana Department of Environmental Management offices.

By: Quarterly

2.2.2. Office of Air Quality

The Office of Air Quality (OAQ) works to safeguard the quality of Indiana's air through implementing the requirements of the Clean Air Act, developing and enforcing state rules governing air quality standards, evaluating and issuing permits for construction and operation, conducting compliance activities and monitoring Indiana's air quality.

Office Contact

Janet McCabe Assistant Commissioner Office of Air Quality (317) 232-8222

e-mail: jmccabe@dem.state.in.us

Our vision is of clean and breathable air throughout our state, which meets all health-based standards. OAQ strives to achieve our vision to continuously reduce toxic releases, maintain air quality improvements and achieve all health based or air quality standards in our state.

We will continue to pursue our vision by effectively using all resources, including coordinating those within OAQ and other offices in a manner that is both innovative and directly reflective of the agency's environmental priorities and by regularly forming working partnerships with EPA, the regulated community and the general public to achieve environmental results.

2.2.2.1. Agency Priorities

Prioritize Services and Programs – Prioritizing Work

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Prioritize Services and Programs – Permits

EPA Role: Work with IDEM to remove barriers to issuance of individual Title V permits, for example for facilities with pending federal enforcement actions. Assist with technical and legal questions, especially with major source permits.

Issue all Title V permits to sources whose applications were submitted prior to June 30, 2002.

By: 12/31/03

Meet all mandated permit deadlines 100% of the time.

Ongoing

Maintain Essential Environmental Services – Agency-Wide Permit Team

Lead Office: Deputy Commissioner / OPA

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Ongoing through 6/30/05

Maintain Essential Environmental Services - Internet Public Notice Standardization

Lead Office: OPA

Participate in workgroup. Assist OPA in the standardization of public notice information posted via the Internet.

Ongoing through 6/30/05

Maintain Essential Environmental Services – Compliance / Enforcement Team

Lead Office: OE

Routinely participate in Compliance / Enforcement Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Ongoing through 6/30/05

Reducing Key Environmental Risks - School 21

EPA Role: Assist with oversight of federal grant, provide technical assistance on risk characterization activities and interpretation of monitoring data.

School 21 (Indianapolis) Toxics Assessment Project; conduct monitoring activities, complete other grant activities and issue final report.

By: 8/30/04

Reducing Key Environmental Risks – Diesel Emissions

Lead Office: OAQ (Working with OPA)

EPA Role: Help identify grants or other funding sources; provide technical assistance

Focusing on Central Indiana, IDEM will enhance diesel emissions reduction efforts by working to develop and implement projects to reduce emissions from diesel sources, including school bus anti-idling pilots, school bus and/or municipal fleet retrofit projects, truck stop electrification project and development of web-based diesel emissions resource center.

- Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

- Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

- Develop and distribute marketing materials for this volunteer program.

By: 6/30/05

- Investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

- Implement diesel retrofit programs in Northwest Indiana as funded by an administrative order between USEPA and Ispat/Inland for \$150,000.

By: 6/30/05

- Complete Hammond and school bus retrofit project. Use remaining grant funds for retrofit project in East Chicago.

By: 5/30/04

- Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

- Complete the Idleaire truckstop electrification project.

By: 6/30/04

Reducing Key Environmental Risks - Mercury

Continuing implementation of the mercury deposition monitoring project and analysis of data in coordination with United States Geological Survey and issue final report.

Ongoing through 6/30/05

Mercury Switch Removal

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

Coalition Building - Explaining new attainment/nonattainment designations

EPA Role: Provide guidance on designation and implementation issues

New federal attainment/nonattainment designations are being developed throughout the nation to comply with federal law. These new designations will likely require some Indiana communities to take remedial action. To help explain these new designations and potential actions, IDEM will:

Conduct public meetings, provide materials, and seek input to educate the public about the changes.

Ongoing

Submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA

Ozone recommendations

By:7/15/03

Fine particle designations

By: 2/15/04

Coalition Building - Reducing environmental asthma triggers

EPA Role: Grant funding. Advisor to the Environmental Quality Workgroup

Lead Office: OPA, which is co-leading the effort with the Indiana State Department of Health, (Indiana State Department of Health (ISDH)) the Indiana Joint Asthma Coalition (InJAC.).

IDEM will work with its co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees. IDEM will:

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems.

By: 10/31/03

Building a Better IDEM - Centralized Web Development

Lead Office: MACS/OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to the Office of Media and Communications Services.

Share information on office publications for use in the on-line publication catalog/archive.

Building a Better IDEM - Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

Each agency Office Data Contact (ODC) will actively participate in Data Management Team meetings and activities regarding the agency's data integration effort. Programs must bring all data projects to the Data Management Team for consideration. Office Data Contacts will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance

Ongoing through 6/30/05

Building a Better IDEM – Establish Facility Registry System (I-FRS)

Lead Office: OMB A-BSD

Assist with mapping Office of Air Quality's Computer Assisted Approval and Tracking System (and possibly other databases) to the Indiana Facility Registry System.

Ongoing through 6/30/05

Building a Better IDEM – Geography Network

Lead Office: OMBA-BSD

Participate in Geographic Information System (GIS) data inventory and in drafting and implementing a metadata development plan.

By: 10/01/03

2.2.2.2. Office Priorities

Complete rulemakings to implement federal new source review reform and maintain federal approval of major source permitting program

PPG (Y/N): N

EPA Role: Provide assistance on federal new source rules; review draft state rule language in accordance with state rulemaking timeframes.

Complete rulemakings to implement provisions of federal new source review rules and to address deficiencies noted in EPA's conditional approval of Indiana's Prevention of Significant Deterioration program.

Final adoption of new source review reform rules.

By: 8/31/04

Prevention of Significant Deterioration corrections.

By:3/4/04

Designation of Nonattainment areas under 8-hour ozone and fine particle standards

PPG (Y/N): Y

EPA Role: Provide technical and legal assistance to IDEM as requested.

Conduct open process to inform and seek input from affected communities; submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA. Focus will be on Central Indiana.

By: 7/15/03 for ozone; 2/15/04 for PM2.5 or other date established by USEPA.

Mid-Course Review of the One-Hour Ozone Attainment Demonstration for Lake and Porter Counties, Indiana

PPG (Y/N): Y

EPA Role: Review and approve the submittal.

IDEM will reassess the modeling analyses and more recent monitoring and emissions data to determine whether the control strategy included in the Attainment Demonstration result in the level of emission reductions and air quality improvements needed to attain the ambient air quality standard for ozone.

Mid-course review:

By: 12/1/04

Participate in national discussions on multipollutant legislation

PPG (Y/N): Y

Participate in discussions on national multipollutant legislation; evaluate impacts (environmental and economic) of different strategies on Indiana; maintain dialogue with stakeholders within the state.

Ongoing

Planning Activities for 8-hour and fine particle ozone standard

PPG (Y/N): Y

EPA Role: Provide technical assistance and written guidance on inventory, modeling, requirements for State Implementation Plans, and other issues

Conduct inventory, modeling, and early planning activities for development of State Implementation Plans for Indiana's 8-hour ozone and PM2.5 nonattainment areas. Work closely with Lake Michigan Air Directors Consortium and other Region V states.

Ongoing through 6/30/05

Lake County SO2 Redesignation Petition

PPG (Y/N): Y

EPA Role: Provide technical and legal assistance; review rule language in accordance with Indiana rulemaking schedule and provide input on draft redesignation petition.

Complete necessary rulemaking; prepare and submit to USEPA redesignation petition for Lake County SO2.

By: Complete rulemaking by June 2004; submit redesignation petition by 12/31/04

Implement Pollution Prevention Efforts

PPG (Y/N): N

Implement the Energy Efficiency/Renewable Energy program under the Indiana Nitrogen Oxides rule in cooperation with the Department of Commerce, Energy Policy Division, consistent with the Memorandum of Understanding.

By: Award allowances under Energy Efficiency/Renewable Energy program by 12/31/03 and 12/31/04

Oversee completion of Clean Materials Technology Institute contract to provide compliance assistance to small businesses and selected industry sectors. Complete a written assessment of the contract and make recommendations for future Technical Assistance Programs.

Ongoing oversight; written assessment of CMTI contract and recommendations completed by 12/31/03

Integrate Pollution Prevention into compliance activities.

Ongoing through 6/30/05

Coke Oven Compliance Oversight

PPG (Y/N): N

EPA Role: Support state efforts to transfer oversight of coke oven compliance program to IDEM from steel mills

Develop and implement a compliance program that provides IDEM oversight of contract for daily observations of coke ovens and Indiana facilities. This includes discussions with coke oven facilities, development of a contract for the program, selection of vendor(s), completion of the contract, establishment of a billing system and implementation and oversight of the contract activities.

By: 6/30/04

Implement Nitrogen Oxides Reduction Rule

PPG (Y/N): N

EPA Role: Administer regional trading program, provide guidance as needed.

Implement the provisions of the Indiana Nitrogen Oxides control rule, including management of allowances, compliance certification activities, distribution of new source and early reduction credits.

Ongoing through 6/30/05

Undertake Projects to Assess and Reduce Risks Identified in IDEM's SEA 259 report

Diesel Emissions

- Investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

- In partnership with OPA, work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

- Working with the Office of Planning and Assessment, form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

Bv: 6/30/04

- Complete the Idleaire truckstop electrification project.

By: 6/30/04

Toxics Monitoring

(a) Locate a Toxwatch monitor in Allen County

By: 9/1/03

(b) Perform air toxics monitoring, via grab samples or with a permanent monitoring site, depending on available funding, in Southwest Indianapolis as indicated by the SEA 259 report; perform a data analysis and draft report with recommendations for next steps.

By: 12/1/03

(c) Perform metals analysis on PM10 filters and draft report with recommendations for next steps.

By: 2/1/04

2.2.2.3. Branch Priorities

2.2.2.3.1. Compliance Branch

Inspect Air Sources for Compliance

PPG (Y/N): N

Implement a strategic inspection plan that will include inspecting all sources responsible for 95% of the emissions statewide (excluding gas compressor stations).

Annually by June 30 each year

Develop and implement the annual Compliance Monitoring Strategy for inspections and compliance evaluations, including the review of Part 70 Annual Compliance Certifications.

By: Develop the Compliance Monitoring Strategy annually by 9/30 each year and implement annually by June 30 each year

Compliance Program for Sources Subject to Leak Detection Requirements

PPG (Y/N): N

Implement coordinated Office of Air Quality/Office of Land Quality compliance program for inspection of sources subject to leak detection requirements. The compliance program will include (1) Office of Land Quality will provide Office of Air Quality with Leak Detection and Repair (LDAR) training on Method 21 testing equipment; (2) Office of Land Quality will accompany Office of Air Quality inspectors on at least one inspection each year and provide technical support on other inspections as requested.

By: (1) Provide training by 12/31/03; (2) Conduct at least one co-inspection by June 30 of each year

Use Existing Databases to Prioritize Sources for Compliance Activities

PPG (Y/N): N

Identify and conduct compliance evaluations on sources where Toxic Release Inventory reports emissions above permitted limits.

By: Review TRI by December 31 of each year and inspect by June 30 of each year

Review current Toxic Release Inventory to identify sources that emit one or more of the five highest reported chemicals and assure appropriate compliance attention.

By: Review Toxic Release Inventory by December 31 of each year and inspect by June 30 of each year

Review emission statements prior to conducting Compliance Monitoring Strategy inspections to identify significant increases in reported emissions.

Ongoing through 6/30/05

Respond to Complaints

PPG (Y/N): N

Respond in timely fashion (no later than 30 days from receipt) to 100% of complaints.

Ongoing through 6/30/05

Coke Oven Compliance Oversight

PPG (Y/N): N

EPA Role: Support state efforts to transfer oversight of coke oven compliance program to IDEM from coke plants.

Develop and implement a compliance program that provides IDEM oversight of contract for daily observations of coke ovens at Indiana facilities. This includes discussions with coke oven facilities, development of a contract for the program, selection of vendor(s), completion of the contract, establishment of a billing system and implementation and oversight of the contract activities.

By: 6/30/04

Compliance Database

PPG (Y/N): N

As available resources allow, develop and begin implementation of a compliance database system that links many of the current Compliance Branch databases as well as other Office of Air Quality and agency databases, following all agency database criteria and assuring compatibility with USEPA compliance data reporting requirements.

By: 6/30/05

Implement Asbestos/Lead Licensing Program

PPG (Y/N): Y

Issue 75% of asbestos/lead licenses within 14 days of receipt and 100% within 21 days of receipt.

Ongoing through 6/30/05

Implement bilingual program, including approval and audit of Spanish language training courses, translation of materials, and customer assistance.

Ongoing through 6/30/05

Issue approval/disapproval of 95% of training course provider applications within 30 days and 100% within 90 days.

Annually June 30 of each year

Audit 10% of asbestos and lead training courses.

Annually June 30 of each year

Monthly post a list of current asbestos and lead-based paint licensees on the IDEM website.

Ongoing through 6/30/05

Asbestos/Lead Compliance Activities

PPG (Y/N): Y

- (1) Inspect 95% of the licensed asbestos/lead contractors that submit notifications annually.
- (2) Review building records from 10 cities or towns to identify demolitions/renovation projects that did not provide asbestos notifications and take appropriate action.
- (3) Inspect 20% of all asbestos notifications received and 90% of all lead-based paint notifications received.
- (4) Audit the risk assessments of at least 15% of those licensed as lead-based paint Risk Assessors.
- (5) Respond to asbestos and lead-based paint abatement complaints no later than the next working day; respond to other complaints within 14 days.

Annually by June 30 of each year

Asbestos/Lead Special Projects

PPG (Y/N): Y

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

Assist Office of Planning and Assessment in administering lead mini-grants, when money is available, to Indiana Health Departments and CAP agencies.

Ongoing

Convert existing Licensing and Tracking databases from Paradox based system to Oracle.

By: 6/30/04

Compliance Test Review Activities

PPG (Y/N): N

Approve protocols within 10-15 days prior to tests, quality assure and validate compliance tests focusing on Title V and Federally Enforceable State Operating Permit sources, sources in nonattainment areas, sources subject to state and federal air toxics rules, sources subject to enforcement orders, and sources seeking to establish alternate emission factors. Observe 75% of tests and review 100% of test reports.

Ongoing through 6/30/05

Continuous Emissions Monitor Activities

PPG (Y/N): N

Certify continuous emissions monitoring systems and quality assure 50% of tests (observe 10% of field tests). Review 100% of the Relative Accuracy and Test Audits (RATA).

Ongoing through 6/30/05

Issue Title V permits

PPG (Y/N): N

EPA Role: Help address permits where federal enforcement actions are pending; provide guidance on compliance monitoring and other permit content issues.

Issue all Title V permits to sources whose applications were submitted prior to June 30, 2001.

By: 80% issued by 6/30/03; 85% issued by 8/31/03; 90% issued by 10/31/03; 100% issued by 12/31/03

Issue timely permit decisions

PPG (Y/N): N

Meet all mandated permit deadlines 100% of the time, without sacrificing permit quality or opportunities for public input.

By: 6/30/05

Issue all Title V and Federally Enforceable State Operating Permit Renewals

PPG (Y/N): N

Issue renewals of all Title V and Federally Enforceable State Operating (FESOP) permits according to regulatory timeframes.

By: 6/30/05

Implement Section 112(j) Maximum Achievable Control Technology Hammer Provisions

PPG (Y/N): N

EPA Role: Act as a clearinghouse for information collected and analyzed by EPA for Section 112(d) NESHAP development to assist IDEM's determination of Section 112(j) MACT.

- (1) Continue outreach efforts by maintaining up-to-date information on EPA's promulgation of Section 112(d) National Emission Standards for Hazardous Air Pollutants (NESHAPs).
- (2) Implement Section 112(j) by making applicability determinations of requests already received, notifying Part I applicants of their status within 10 days of the applicable Part 2 application deadlines, acting on new or resubmitted requests for applicability determinations within 120 days of the effective date of the new section 112(j) rule, and acting on Part 2 applications by issuing a permit modification approval containing Maximum Achievable Control Technology (MACT) requirements within 18 months of receipt of a complete application, unless EPA has promulgated an effective Section 112(d) National Emission Standards for Hazardous Air Pollutants (NESHAPs) by then.

Ongoing through 6/30/05

Enhance Public Participation in Permit Process

PPG (Y/N): N

EPA Role: Participate in public education sessions, based on interest and available resources.

Conduct outreach and training sessions in four or more Indiana regions on general air issues and on the permitting process.

By: Outreach sessions completed by 7/31/03

Conduct public meetings (prior to formal public hearing) on draft Title V permits of particular public interest.

By: public meetings scheduled based on interest, but to be completed in the 8-9/30/03 timeframe

Provide additional assistance on particularly lengthy or complex permits, or permits of particular public interest (e.g. steel mills, chemical plants).

By: Public hearings held in September-October 2003 timeframe

Complete rulemakings to implement federal new source review reform and maintain federal approval of major source permitting program

PPG (Y/N): N

Complete rulemaking to implement provisions of federal new source review rules.

By: First Notice published by 4/1/03; Second Notice published by 9/1/03; Preliminary adoption in February 2004; Final adoption in 8/31/04;

Complete rulemaking to address deficiencies noted in EPA's conditional approval of Indiana's Prevention of Significant Deterioration program.

By: 3/3/04, including preliminary adoption by 9/30/03 and final adoption by 12/31/03

2.2.2.3.2. Programs Branch

Designation of Nonattainment areas under 8-hour ozone and fine particle standards

PPG (Y/N): Y

Conduct open process to inform and seek input from affected communities; submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA.

Ozone

By: 7/15/03

PM2.5

By: 2/15/04 (or other date established by USEPA)

Planning Activities for 8-hour ozone standard

PPG (Y/N): Y

Conduct inventory, modeling and early planning activities for development of State Implementation Plans for Indiana's 8-hour ozone nonattainment areas. Review and comment on USEPA draft implementation guidance. Work closely with Lake Michigan Air Directors Consortium and other Region V states.

Preliminary baseline sensitivity modeling.

By: 10/31/03

Final 2002 baseline inventory.				
By: 10/31/04				
Regulatory case strategy modeling.				
Ongoing through 6/30/05				
Planning Activities for Fine Particle Standard PPG (**)	//N): Y			
Conduct inventory, modeling and early planning activities for development of State Implementation Plans for Indiana's fine particle nonattainment areas. Conduct analysis of three full years of PM2.5 monitoring data. Review and comment on USEPA draft implementations. Work closely with Midwest Regional Planning Organization and other Region Assess current status of controls on utility units and the impacts of those uncontrolled by scrubbers and NOx controls; issue report.	entation			
Complete analysis of first three years of monitoring data.				
By: 6/30/03				
Develop utility control report.				
By:12/31/04				
Develop PM2.5 inventory for 2002.				
By: 6/30/05				
Modeling and data analysis.				
Ongoing through 6/30/05				
Lake County SO2 Redesignation Petition PPG (**)	//N): Y			
Complete necessary rulemaking; prepare and submit to USEPA redesignation petition fo County SO2.	r Lake			
Complete rulemaking.				
By: 6/30/04				
Submit redesignation petition.				
By: 12/31/04				
Participate in national discussions on multipollutant legislation PPG (//N): Y			
Participate in discussions on multipollutant legislation; evaluate impacts (environmental and economic) of different strategies on Indiana; maintain dialogue with stakeholders within the state.				
By: 6/30/05				

Nitrogen Oxides Rulemaking, Phase II

PPG (Y/N): N

EPA Role: Issue Phase II NOx rule, provide guidance to states for implementation into state plans

Undertake rulemaking to implement US EPA's Phase II NOx control rule.

By: Schedule will be established when EPA issues its rule.

Regional Haze

PPG (Y/N): Y

EPA Role: Provide implementation guidance for Best Available Retrofit Technology and Regional Haze Implementation Plan development

Prepare inventory of Indiana sources subject to Best Available Retrofit Technology requirement under Regional Haze program.

Ongoing through 6/30/05

School 21 Air Toxics Assessment Project

PPG (Y/N): Y

EPA Role: Assist with oversight of federal grant, provide technical assistance on risk characterization activities and interpretation of monitoring data.

Perform air risk characterization, additional monitoring, and support other grant activities. Issue final report.

By: 8/30/04

Mercury Deposition Monitoring Project

PPG (Y/N): N

Continue implementation of mercury deposition monitoring project and complete data analysis in cooperation with the United States Geological Survey. Issue final report.

By: 6/30/05

Electric Arc Furnace Assessment, Phase II

PPG (Y/N): N

EPA Role: Provide technical assistance

Develop scope of study to create an emissions profile and perform air risk characterization for an Indiana electric arc furnace.

By: 9/30/03

Issue final report.

By: 6/30/04

Air Toxics Inventory

PPG (Y/N): Y

Complete 2001 Great Lakes Air Toxics Inventory (Regional Air Pollutant Inventory Development System (RAPIDS))

By: 9/30/03

Emissions Reporting Rule

PPG (Y/N): N

EPA Role: Provide input on draft rule language as requested and guidance on emissions reporting for PM2.5

Complete current rulemaking.

By: 12/31/03

Initiate and complete rulemaking to add reporting of ammonia and PM2.5, per US EPA's Combined Emissions Reporting Rule.

Publish First Notice of Rulemaking by 3/1/04; preliminary adoption by 9/30/04; final adoption by February 2005

Obtain EPA Approval of Outstanding Rule and Plan Submittals

PPG (Y/N): Y

EPA Role: provide timely comment and identify approvability issues at an early stage in the process; review and act on submittals.

Work with USEPA to gain approval of the following pending rule or plan submittals: Process weight rate; changes to 326 IAC 4-2 and 9-1; Secondary lead smelters; Commercial and industrial waste incinerators plan submittal; changes to 326 IAC 8-2-9 and 13-3-1 (Clark and Floyd redesignation); Lilly Reasonably Available Control Technology (RACT) plan; Canam Steel RACT plan; Transwheel RACT plan; Crane #2; Prevention of Significant Deterioration (PSD) Corrections; NOx Corrections; New Source Review (NSR) Reform Plan submittal; Lake County SO2 rule: US Steel PM10 revisions.

By: 6/30/05

Emissions Statements/2002 Baseline Inventory

PPG (Y/N): Y

Enter data into the Satellite i-STEPS software program and send Quality Assurance reports to companies.

By: 9/30/03

Finish compilation of data into the Satellite i-STEPS software program and prepare billing file.

By: 12/31/03

Add area source data and submit 2002 data to EPA National Emissions Inventory version 1.

By: 6/30/04

Toxwatch Analysis

PPG (Y/N): Y

Develop screening mechanism for regular review and flagging of HAP air quality data of concern and protocol for addressing it.

By: 12/31/03

Analyze Toxwatch data from 1999 through 2004 and issue report.

By: 6/30/05

2.2.2.3.3. Air Monitoring Branch

Ambient Air Quality Monitoring

PPG (Y/N): Y

EPA Role: Monitoring guidance, funding oversight

Maintain Indiana's ambient air monitoring network for criteria pollutants, meeting data completeness goal of 90%.

Ongoing through 6/30/05

Fine Particle Monitoring

PPG (Y/N): Y

EPA Role: Monitoring and Network Guidance, Grant oversight

Establish continuous fine particle monitors at 8 additional sites.

Deploy 5 sites by 12/31/03; deploy 3 sites by 12/31/04

Monitor for Air Toxics

PPG (Y/N): Y

EPA Role: Provide funding and risk assessment guidance

Operate basic canister-based air toxics monitoring program at eight sites in Indiana.

By: Ongoing through 6/30/05

Publish toxics monitoring data on IDEM webpage quarterly.

Quarterly, through 6/30/05

Monitor for Air Toxics at School 21 in Indianapolis

PPG (Y/N): Y

EPA Role: Provide funding through Air Toxics grant and risk assessment guidance.

Operate toxics canister sampler.

By: Ongoing through 5/15/04

Conduct auto gas chromatography monitoring for 56 compounds.

By: Ongoing through 5/15/04

Conduct monitoring for polycyclic aromatic hydrocarbons for 10 episodic samples.

By: Ongoing through 5/15/04

Conduct meteorological monitoring.

By: Ongoing through 5/15/04

Prepare final report on monitoring program.

By: 8/31/04

Conduct Fine Particle Speciation Monitoring

PPG (Y/N): Y

EPA Role: Monitoring guidance, coordination of final report on beta testing

Complete beta testing of speciation equipment and submit final report.

By: 12/31/03

Establish one additional continuous speciation site if the testing is successful.

By: 12/31/04

Conduct filter-based speciated monitoring at seven (7) sites.

Ongoing through 6/30/05

Establish Aethalometer Monitor for elemental and organic carbon monitoring

PPG (Y/N): Y

EPA Role: Monitoring and data analysis guidance

Establish and operate Aethalometer monitor at Washington Park monitoring site. Evaluate as alternative method for continuous carbon monitoring.

Establish by 10/1/03, operate through 6/30/05

Operate Visibility Monitor

PPG (Y/N): Y

EPA Role: Provide guidance to maintain consistency with other National Hazecam network monitors.

Operate visibility monitor and provide data to regional Hazecam network. Provide ozone and PM2.5 data to the Hazecam site to provide correlation with impaired visibility.

By: Ongoing through June 30, 2005

Operate PAMS monitoring site and analyze data

PPG (Y/N): Y

EPA Role: Monitoring guidance

Operate the PAMS site in Northwest Indiana for hourly ozone, carbonyl, NOx, NOy, and meteorological information. Coordinate with USEPA and other Region V states on operation and quality assurance.

Ongoing through 6/30/05

Conduct Special Purpose Monitoring

PPG (Y/N): Y

Establish and operate PM-10 site at industrial-oriented site. Submit report on monitoring project.

Establish by 10/1/03; operate through 9/30/04; submit report by 12/31/04

Identify location for special purpose monitoring in FY05.

By: 6/30/04

Confined Animal Feeding Monitoring Project

PPG (Y/N): N

EPA Role: Assist with identification of available funding

Work with Purdue and volunteer Confined Animal Feeding Operation (CAFO) (Rose Acres) on monitoring study to measure levels of ammonia, hydrogen sulfide, and fine particulate. Project dependent on obtaining funding.

By: Completion date dependent on timing and availability of funds.

Regional Monitoring Strategy

PPG (Y/N): Y

EPA Role: Approval of strategy, revision of federal monitoring requirements as necessary, approval of strategy and proposed networks.

Propose and implement revised monitoring networks in accordance with the Regional and National Monitoring Strategies (when finalized), and the needs of Indiana's ambient monitoring program for criteria pollutants and implement revisions upon approval by USEPA.

Submit recommended network

By: 9/30/03

Implement revisions

By: 6/30/04 (date contingent upon USEPA approval)

Provide Monitoring Data as needed for Attainment/Nonattainment Classifications

PPG (Y/N): Y

Provide final, quality assured data for the 2003 and 2004 ozone seasons.

By: As early as possible but no later than November 15 for 2003 and by November 15 for 2004 for ozone season data

Provide final, quality assured data for PM2.5.

By: March 31 of the following year.

Provide Timely and High Quality Information on Air Quality to the Public

PPG (Y/N): Y

Improve data quality handling operations to provide more complete and accurate ambient air quality data by implementing the Leading Environmental Analysis and Display System (LEADS®) system.

Complete deployment in two regional areas (Fort Wayne and Northwest Indiana) and new data website online.

By: 6/30/04

All additional continuous monitoring sites.

By: 6/30/05

Produce daily and hourly ozone and PM2.5 data and maps to be posted on the internet through the regional mapping project, AIRNow.

Hourly through 6/30/05

Update Toxwatch page.

Monthly through 6/30/05

Provide data from all continuously monitored parameters in a timely and accurate manner via the Office of Air Quality Ambient Air Quality website.

Hourly through 6/30/05

2.2.2.4. Office Support

Manage Air Grants

PPG (Y/N): Y

EPA Role: Coordinate with IDEM staff on grant applications and submittals

Work with program staff, Office of Management and Budget Administration and EPA grant coordinators to ensure timely and accurate submittal of federal grants, grant extensions, amendments and revisions.

Ongoing through 6/30/05

Administer BP Amoco Fine Money Projects

PPG (Y/N): N

Develop and oversee contracts or other mechanisms for project proponents to implement projects funded by BP Amoco fine money.

Ongoing through term of individual grant.

Develop grant process and conduct second round of project solicitation and awards.

By: 6/30/05

Quality Management Plan

PPG (Y/N): Y

Identify all current operating procedures and quality assurance documents to IDEM QA manager.

By: 12/31/03

Review Office of Air Quality portions of the Quality Management Plan and identify any outstanding procedures or documentation. Consider needs for additions to Quality Management

Plan. Prioritize outstanding commitments and/or additional needs and establish schedule for completion. Implement schedule.

Review and establishment of prioritized schedule.

By: 12/31/03

2.2.3. Office of Legislative and Business Relations

The Office of Legislative and Business Relations (OLBR) serves as a liaison to the Indiana General Assembly and assists the 150 state legislators and their constituents. In addition, OLBR serves members of Indiana's business community both large and small.

The Office of Legislative Relations responds to hundreds of constituent requests. A wide range of

Office Contact(s):

Tonya Galbraith
Director
Office of Legislative and Business
Relations

(317) 232-8598

e-mail: tgalbrai@dem.state.in.us

constituent cases included anything from checking on the status of a wastewater permit, State Revolving Loan application or a Title V Permit to helping set up meetings for small communities to discuss enforcement actions.

The Office of Business Relations, is governed by IC 13-28-3-4, assists the business community with specific matters pending before the agency including status of permit applications, enforcement issues, and any business-related customer service issues. The office listens to the concerns of the business community, investigates and facilitates the proper resolution of issues.

2.2.3.1. Agency Priorities

Building better relationships with the Indiana General Assembly

Plan at least 10 educational visits with legislators in their districts. This outreach will include touring wetlands, agricultural operations, wastewater treatment facilities and other environmental-related programs district.

Meet with at least 50% of the committee members of the House and Senate Environment Committees in their district, and visit a priority environmental concern or success in their district.

Plan an educational forum as part of the Environmental Quality Service Council, where various IDEM branches could explain their function and process, i.e., permit writers explain what they do; geologists explain their function, etc.

Building a better relations with Indiana's business community

Set up meetings with business, industries and municipalities across the state. This will include touring the operations of a steel plant, a power plant or a wastewater treatment plant. Meet one-on-one with the environmental representatives at these operations, whether it be AEP's director of environmental science or the Shelbyville wastewater treatment plant operator to determine if there are any real or perceived problems with working with IDEM.

Develop positive relations with business and industry organizations through one-on-one interaction.

Assist Indiana's businesses with compliance questions, permits and technical assistance.

Work closely with the Indiana Department of Commerce's Business Ombudsman and IDEM's Office of Pollution Prevention and Technical Assistance and the Office of Community Relations in assuring that new and existing companies comply with environmental regulations.

Make a special effort to contact industries, such as foundries, which are declining in the state, by providing compliance assistance, and technical and permit assistance.

By: Dec. 31, 2004

2.2.4. Office of Community Relations

The Office of Community Relations assists the general public, local and state government officials and community groups with various environmental issues and concerns. The staff listens to community concerns and investigates and facilitates the resolution of these issues. Community Relations is also the lead office in the coordination of special

Office Contact(s):

Karen Terrell Director Office of Community Relations (317) 233-6648 e-mail: kterrell@dem.state.in.us

events and conferences. The Office of Community Relations staff assists in the operation of the Compliance and Technical Assistance Program (CTAP).

2.2.4.1. Agency Priorities

Speaker's Bureau

Staff & topics have been identified and this information is on the Community Relations web page. Office of Community Relations will develop a marketing strategy to get the word out about this service. Also, Office of Community Relations will continue to update and revise this site and the information contained as needed.

Develop marketing strategy.

By: 6/30/03; updates - ongoing

2.2.5. Office of Investigations

The primary responsibility of the Office of Investigations (OI) lies in the support of voluntary compliance activities of IDEM Programs and Regional Offices through the deterrent effects of strong environmental enforcement actions against serious or repeat violators. Complaints investigated by OI are identified on the bases of significance of harm, entity violation history, and culpability.

Office Contact

Sandra Jensen

Director
Office of Investigations
(317) 233-1202
e-mail: sjensen@dem.state.in.us

that occur or may be designed as a broad

Investigations may be initiated in response to events that occur or may be designed as a broadbased proactive investigation in response to such issues as common violatitive practices within a regulated community.

2.2.5.1. Agency Priorities

Maintain Essential Environmental Services and Deliver Services in an Efficient Manner as Practical

"Compliance and Enforcement Sampling Operations Plan" to enhance compliance sampling and monitoring as well as establish an on-call sampling operations team to respond to environmental emergencies.

Final Plan Draft Complete

By: 10/1/03

Agency-Wide Distribution and Implementation Training Complete:

By: 3/31/04

First Trial Run Complete:

By: 12/1/04

"Enforcement Case Development Training Program" to enhance IDEM regulatory and enforcement staff knowledge of their role and responsibilities with respect to environmental enforcement.

IGCN Training complete

By: 9/1/04

NWRO/NRO Training complete

By: 10/1/04

Southwestern Regional Office training complete.

By: 11/1/04

- "Agency-Wide Progressive Enforcement Plan" to promote fairness and consistency in IDEM enforcement methodology while reducing duplication of effort in the following ways:
 - a) Enhanced referral and notification between the Office of Enforcement and Office of Investigations.
 - b) Increasing program staff ability to identify proper referral type.

Develop plan for identifying proper enforcement response based upon violation history, culpability and/or significance of harm.

By: 7/1/04

Office of Investigations Director and Office of Enforcement Section Chiefs will meet quarterly to review plan effectiveness and revise as necessary.

Ongoing

Conduct review of referrals made to both Office of Enforcement and Office of Investigations to identify those that should have been referred to the other.

By: 8/1/04

Utilize review findings as basis for section/branch/program specific enforcement referral training/education.

By: 12/31/04

2.2.6. Office of Enforcement

An important step toward making Indiana a cleaner, healthier state is to insure businesses, individuals, and government entities are complying with environmental laws. The Indiana Department of Environmental Management's (IDEM) Office of Enforcement (OE) mission is to respond to violations

Office Contact

Felicia Robinson Office of Enforcement (317) 233-3978

e-mail: frobinso@dem.state.in.us

with timely, quality enforcement actions which accomplish three (3) major goals:

- (1) achieve compliance,
- (2) deter future violations, and
- (3) result in an improved environment.

IDEM uses the toll of enforcement through a series of legal actions to bring facilities into compliance with the law (Statute Authority IC 13-13-3-3).

2.2.6.1. Agency Priorities

Enhance IDEM's Compliance/Enforcement Team

The Compliance/Enforcement Team provides the base for true multi-media initiatives. These initiatives will include periodic cross media educational opportunities and open forums designed to enable staff to identify cross media concerns and provide coordinated approaches to regulated community compliance assistance and enforcement actions. The Compliance/Enforcement Team will enhance IDEM staff's ability to identify and pursue appropriate compliance and enforcement actions through the establishment of model referrals, better coordination with IDEM's regional offices, compliance documentation and enforcement case management training, as well as information and evidence collection training.

Continue work of agency-wide Compliance Enforcement Team to meet/communicate regularly to evaluate information and formulate agency-wide compliance and enforcement strategies and resource allocation.

By: 6/30/05

A. Continue Compliance/Enforcement Planning

Lead Office:

a) Continue multi-media compliance and enforcement planning and coordination in accordance with current operating procedures (COP) developed by the Compliance Enforcement Team during 2000-2001. Utilize Compliance/Enforcement Planning COP and periodically revise (as needed).

Ongoing

b) Each compliance branch will work with the NWRO to come up with focused inspection and compliance goals for each of the steel mills.

c) Determine if and how multi-media steel mill meetings will occur. If it is decided that the
meetings will be held, program offices will meet to discuss a format and content for the meetings
with the steel mills.

By: 6/30/04

d) Continue development and implementation of steel mill Compliance Action Plan.

By: 6/30/04

e) Continue development and implementation of foundry sector Compliance Action Plan.

Ongoing

f) Each office will work with the NWRO to come up with goals and objectives for each of the Indiana steel mills.

By: 6/30/04 and 6/30/05

B. Improve Inspection and Enforcement Procedures

Lead Office: OE

Develop a model referral and referral checklist to help generate a complete and high quality referral.

By: 6/30/04

Review and evaluate the inspection process after implementing the February 4/03 COP for Conducting Single-Media Inspections.

By: 6/30/04

C. Compliance and Enforcement Sampling Operations Plan

Lead Office:

OI

"Compliance and Enforcement Sampling Operations Plan" to enhance compliance sampling and monitoring as well as establish an on-call sampling operations team to respond to environmental emergencies.

By: 10/1/03 - final draft plan

3/31/04 - Agency-Wide Distribution and Implementation Training Complete

12/1/03 - First Trial Run Complete

D. Enforcement Case Development Training Program

Lead Office:

Enhance IDEM regulatory and enforcement staff knowledge of their role and responsibilities with respect to environmental enforcement.

Training Material Prepared and Presenters Identified.

By: 9/1/04 - IGCN Training complete

10/1/04 - NWRO/NRO Training complete

11/1/04 - SWRO Training complete

E. Agency-Wide Progressive Enforcement Plan

Lead Office:

- "Agency-Wide Progressive Enforcement Plan" to promote fairness and consistency in IDEM enforcement methodology while reducing duplication of effort in the following ways:
- 1) Enhanced referral and notification between the Office of Enforcement and Office of Investigations; and 2) Increasing program staff ability to identify proper referral type.

Develop plan for identifying proper enforcement response based upon violation history, culpability and/or significance of harm.

By: 7/1/04

OI Director and OE Section Chiefs meet quarterly to review plan effectiveness and revise as necessary.

Ongoing

Conduct review of referrals made to both OE and OI to identify those that should have been referred to the other.

By: 8/1/04

Utilize review findings as basis for section/branch/program specific enforcement referral training/education.

By: 12/31/04

Continuing Timely, Accurate Enforcement

The Office of Enforcement will continue to provide support to IDEM's programs (including the Office of Air Quality, Office of Water Quality, and Office of Land Quality) for enforcement actions.

5. Building a Better IDEM - Expand Health and Safety Training

Explore possibility of expanding in-house 8-hour training.

Establish training curriculum relevant to Office of Water Quality, Office of Air Quality, Office of Pollution Prevention and Technical Assistance, and the Office of Legal Counsel for in-house training programs.

By: 9/1/03

Implement in-house training of new curriculum.

By: 1/1/04

Develop "train-the-trainer" curriculum for in-house First Aid/CPR training.

- Train 25% of field staff in First Aid/CPR.

By: 6/30/03

- Offer training for non-field staff in First Aid/CPR.

By: 10/1/03

- Compile and disseminate security and personal safety information.
- Conduct informational sessions to discuss relevant building security and emergency preparedness in all IDEM locations.

By: 10/1/03

- Review and revise Emergency Action Plans for all locations to address concerns recognized from staff during informational sessions.

By: 12/31/03

- Disseminate updated Emergency Action Plans to all staff.

By: 2/28/04

- Continue involvement in Indiana Government Center Core Team for emergency preparedness to ensure that the Agency's plan is consistent with the campus plan.

By: 5/31/04

2.2.6.2. Office Priorities

Active Exceptions list

PPG? (Y/N): N

Contact(s): Mark Stanifer

Reduce the Active Exeptions list to leas than 2% of the total active NPDES permitted facilities.

By: 6/30/05

Maintain a Significant Noncompliance rate < or = 10%.

Ongoing

2.2.7. Office of Land Quality

The OLQ is charged with protecting public health and the environment by assuring planning for, and the proper handling and disposal of, wastes in Indiana; protecting the public in the event of chemical spills and other environmental emergencies; and addressing short and long-term cleanup projects at contaminated sites throughout the state.

The Assistant Commissioner and Deputy Assistant Commissioner work as a team to assure that sound

Office Contact

Vacant Assistant Commissioner Office of Land Quality

Bruce Palin
Deputy Assistant Commissioner
Office of Land Quality
(317) 233-6591
e-mail: bpalin@dem.state.in.us

environmental policies are developed and implemented relative to the protection and remediation of land in the State of Indiana. The Deputy Assistant Commissioner may focus on special initiatives while assisting the Assistant Commissioner in directing and supervising a large number of resources and staff.

2.2.7.1. Agency Priorities

Building a Better IDEM – Centralized Web Development

Lead Office: OMBA-BSD/MACS

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to the Office of Media and Communications Services.

Share information on office publications for use in the on-line publication catalog/archive.

Building a Better IDEM - Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

Office Data Contacts (ODCs) will actively participate in data management team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. ODCs will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance.

Ongoing through 6/30/05

Building a Better IDEM - Establish Facility Registry System (I-FRS)

Lead Office: OPA/OMBA-BSD

Assist with mapping the Indiana Facility Registry System to ULCERS, and possibly map RCRAInfo / Indiana RCRA Activity Tracking System (IRATS) to the Indiana Facility Registry System.

Ongoing through 6/30/05

Building a Better IDEM – Geography Network

Lead Office: OMBA-BSD

Participate in Geographic Information System (GIS) data inventory and in drafting and implementing a metadata development plan.

By: 10/01/03

Building a Better IDEM - Address Quality Issues - Quality Management Plan

Lead Office: OPA

Actively participate in the Region 5 State Science Council efforts as well as the IDEM 'peer review' panel development and implementation processes.

Ongoing through 6/30/05

Maintain Essential Environmental Services - Agency-Wide Permit Team

Lead Office: Deputy Commissioner / OPA

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Ongoing through 6/30/05

Maintain Essential Environmental Services – Internet Public Notice Standardization

Lead Office: OPA

Participate in workgroup. Assist the Office of Planning and Assessment in the standardization of public notice information posted via the Internet

Ongoing through 6/30/05

Maintain Essential Environmental Services - Compliance / Enforcement Team

Lead Office: OE

Routinely participate in Compliance / Enforcement Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Ongoing through 6/30/05

Reducing Key Environmental Threats – Coordinating with SEMA to develop and implement emergency response plans

Lead-Office: OLQ

Participate in developing and updating multi-agency counter—terrorism response plans and all hazards plans. (Indiana State Agency Comprehensive Emergency Management Plan, U.S. EPA Area Contingency Plans for Indianapolis and Louisville, Board of Animal Health Foreign Animal Disease Plan, Indiana Continuity of Government Plan)

By: During FY 2003-2005

Contribute to the design and participate in local, state, and federal counter-terrorism and hazmat response and recovery exercises. (Chemical Stockpile Emergency Preparedness Plan (CSEPP (VX)), Operation River City (Louisville), Hoosier Guardian, Local Emergency Planning Committee exercises, Pipeline Group tabletops)

Coordinating with State Emergency Management Agency to develop a drinking water system response protocol that will be incorporated into Indiana's Statewide Comprehensive Emergency Management Plan. The response protocol will be designed to address two important aspects of emergency planning and response. First, the protocol will address how specifically the state will respond to an incident, real or threatened, at a public water system. The second portion of the protocol will deal with the decision making process for determining what to communicate to the public and what steps to take regarding the safety and use of the drinking water based on the findings of the initial investigation.

By: 1/31/04

Participate in multi-agency counter-terrorism and hazmat response forums (Counter-Terrorism and Security Council, Safe Schools Advisory Council, Purdue University Homeland Security Institute, U.S. EPA Region 5 Regional Response Team.)

Provide staff and support to the Indiana Emergency Response Commission

Provide after hour's duty roster of IDEM staff to State Emergency Management Agency for staffing State Emergency Management Agency's Emergency Operations Center.

Participate in State Emergency Management Agency advisory committee regarding Federal Emergency Management Agency and Department of Justice counter-terrorism grants.

Reducing Key Environmental Threats – Risk Advisory Committee

Lead-Office: OLQ

Risk Integrated System of Closure

Institutionalize the Risk Integrated System of Closure policy (i.e. Project Manager and Technical staff training, additional resources for Risk Integrated System of Closure reviewers).

By: 6/30/04 and 6/30/05

Evaluate reallocating more staff resources to completing Risk Integrated System of Closure reviews.

By: 6/30/04 and 6/30/05

Evaluate current Risk Integrated System of Closure Manuals for improved clarity and organization in an effort to provide complementary manuals that are user friendly.

By: 6/30/04 and 6/30/05

Improve coordination with all sister agencies who have tasks related to Risk Integrated System of Closure in an effort to define roles and responsibilities for greater resource efficiency.

By: 6/30/04 and 6/30/05

Develop and implement timeframe for finalizing the Total Petroleum Hydrocarbons and Vapor Intrusion policies.

By: 6/30/04 and 6/30/05

Prioritize Office of Land Quality Services and Programs

Lead-Office: OLQ

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05

Semi-annual reviews.

By: 12/31/03; 6/30/04; 12/31/04; and 6/30/05

2.2.7.2. Office Priorities

Information Management

PPG (Y/N): N

Maintain/update Geographic Information System (GIS) coverages.

By: 6/30/04 and 6/30/05

Improve Resource Conservation and Recovery Act (RCRA) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) site coordination by continuing to work toward Universal Site Database.

By: 6/30/04 and 6/30/05

Evaluate current data collection procedures (i.e. value/gaps), and implement standardized electronic data submittal processes; to further develop and support systems to meet program management and staff needs.

By: 6/30/04 and 6/30/05

Develop an interface with new databases converted from Paradox for staff use.

By: 6/30/04 and 6/30/05

OLQInfo Update

PPG (Y/N): N

EPA Role: Grant Funding

OLQInfo is the data management system that the Office of Land Quality uses to track regulatory information about Resource Conservation and Recovery Act (RCRA) and Solid Waste regulated activities and operations in Indiana. The Office of Land Quality will improve the agency's ability to manage the confined feeding program by:

- 1) creating a new module in OLQInfo for the Confined Feeding Operation (CFO) program, and,
- 2) transferring existing Confined Feeding Operation (CFO) data from the current Paradox-based system to a more robust Oracle system.

The project will also include updating the system interface to:

- A) Improve user interaction with the database, reducing the burden in sharing critical National Pollutant Discharge Elimination System (NPDES) Confined Animal Feeding Operation (CAFO) data with Permit Compliance System (PCS) data via the National Environmental Information Exchange Network (NEIEN), and
- B) Integrate OLQInfo with the Indiana Facility Registry System (I-FRS) to facilitate sharing information with other state and federal databases.

By: 4/1/05

Identify and Design initiatives to assess and improve OLQ's internal business operation and quality of work life.

PPG (Y/N): N

Develop consistent office-wide process management measures for key processes including cycle time reduction, constituent feedback, performance, cost reduction and resource allocation.

By: 6/30/04 and 6/30/05

Establish current operating procedure for staff tracking of contracts.

By: 6/30/04 and 6/30/05

Update Office of Land Quality locator directory.

By: 6/30/04 and 6/30/05

Risk Integrated System of Closure

PPG (Y/N): N

Institutionalize the Risk Integrated System of Closure policy (i.e. Project Manager and Technical staff training, additional resources for Risk Integrated System of Closure reviewers).

By: 6/30/04 and 6/30/05

Evaluate reallocating more staff resources to completing Risk Integrated System of Closure reviews.

By: 6/30/04 and 6/30/05

Evaluate current Risk Integrated System of Closure Manuals for improved clarity and organization in an effort to provide complementary manuals that are user friendly.

By: 6/30/04 and 6/30/05

Improve coordination with all sister agencies who have tasks related to Risk Integrated System of Closure in an effort to define roles and responsibilities for greater resource efficiency.

By: 6/30/04 and 6/30/05

Develop and implement timeframe for finalizing the Total Petroleum Hydrocarbons and Vapor Intrusion policies.

By: 6/30/04 and 6/30/05

CAFOs PPG (Y/N): Y

IDEM will implement the Confined Animal Feeding Operation (CAFO) General Permit Rule and comply with Federal regulations.

By: 6/30/04 and 6/30/05

Reducing Risk PPG (Y/N): N

Targeting specific contaminants from the Office of Land Quality priority pollutant list (Top Ten Contaminant List).

By: 6/30/04 and 6/30/05

Targeting specific contaminants from the Office of Land Quality priority pollutant list (Top Ten Contaminant List).

By: 6/30/04 and 6/30/05

Developing a process to make better risk based decisions and allocation of resources.

By: 6/30/04 and 6/30/05

Assisting other IDEM offices in addressing their priority contaminants.

By: 6/30/04 and 6/30/05

2.2.7.3. Remediation Branch Priorities

Site Investigation PPG (Y/N): N

Conduct up to twelve (12) Integrated Assessments per fiscal year.

By: 6/30/04 and 6/30/05

Conduct up to five (5) Site Reassessments per fiscal year.

By: 6/30/04 and 6/30/05

Conduct up to four (4) Expanded Site Assessments per fiscal year.

By: 6/30/04 and 6/30/05

Prepare up to three (3) Hazard Ranking System (HRS) Packages or as needed, within 180 days of notice to EPA.

During: FY 2003 - 2005

Conduct Pre-CERCLIS (Comprehensive Environmental, Response, Compensation and Liability Information System) Screenings as needed.

During: FY 2003 - 2005

Conduct Resource Conservation and Recovery Act (RCRA) PA/VSI reviews as needed.

During: FY 2003 - 2005

Brownfields PPG (Y/N): N

Complete/review up to ten (10) Brownfields Environmental Assessments (BEAs) or equivalent investigations for communities.

By: 6/30/04 and 6/30/05

Conduct the review of up to twenty (20) Brownfields technical documents.

By: 6/30/04 and 6/30/05

Publish four (4) Brownfields Bulletins on a quarterly basis.

By: 6/30/04 and 6/30/05

Conduct up to four (4) Indiana Brownfields Task Force meetings.

By: 6/30/04 and 6/30/05

Conduct or participate in Brownfields workshops, seminars, and conferences as requested.

By: 6/30/04 and 6/30/05

Incorporate the new federal Brownfields legislation into the State Brownfields Program.

By: 6/30/04 and 6/30/05

Abandoned Landfills

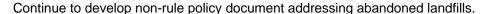
PPG (Y/N): N

Assess four (4) additional abandoned landfills.

By: 6/30/04 and 6/30/05

Continue assessment work begun on abandoned landfills begun in years 2000 and 2001.

By: 6/30/04 and 6/30/05



By: 6/30/04 and 6/30/05

Provide education and outreach to communities and parties with abandoned landfills in need of assessment and remediation.

By: 6/30/04 and 6/30/05

Continue to coordinate with other sections when landfill conditions warrant other expertise/funding mechanisms (i.e. Brownfields, Site Investigation, and Voluntary Remediation Program).

By: 6/30/04 and 6/30/05

Superfund PPG (Y/N): N

Continue and/or begin three (3) site contamination studies (Remedial Investigations/Feasibility Studies).

By: 6/30/04

Complete four (4) decision documents and continue working toward other decision documents (Record of Decision, Record of Decision Amendment or Explanation of Significant Difference) for target sites.

By: 6/30/04

Continue and/or begin ten (10) site Remedial Design/Remedial Actions (RD/RA).

By: 6/30/04

Continue and/or begin Operation and Maintenance (O&M) for eighteen (18) sites.

By: 6/30/04

Complete seven (7) Five-Year Review Reports.

By: 6/30/04

Continental Steel (Superfund Project)

PPG (Y/N): N

(a) Complete Remedial Designs for Contract Units 1-5.

By: 9/30/03

(b) Select a construction contractor for Contract Unit 3.

By: 6/30/05

(c) Select Construction Contractor for Contract Unit 4 for Continental Steel Site.

By: 6/30/05

(d) Provide project oversight of construction activities for Contract Unit 1.

Through 12/31/04

RCRA Corrective Action

PPG (Y/N): Y

For Resource Conservation and Recovery Act (RCRA) Government Performance and Review Act (GPRA) Corrective Action universe, IDEM will provide U.S. EPA Region 5 quarterly updates for meeting Environmental Indicator forms CA 725 and CA 750 activities and continue to coordinate and communicate with Region 5 on progress at non-GPRA Corrective Action sites.

By: 6/30/04 and 6/30/05

Immediate Removals

PPG (Y/N): N

Stabilize and mitigate immediate threats to human health and the environment.

By: 6/30/04 and 6/30/05

Respond to 100% of the immediate removal requests within five (5) days of referral.

By: 6/30/04 and 6/30/05

Refer to U.S. EPA Region 5 Emergency Response Section and partner on those sites exceeding IDEM's resources.

By: 6/30/04 and 6/30/05

Management of Remedial Response sites

PPG (Y/N): N

Evaluate 100% of all new sites referred to Remedial Response from Emergency Response to determine whether long term oversight is required and to establish priority.

By: 6/30/04 and 6/30/05

Issue fifty (50) no further action letters on sites that have completed all necessary response activities per fiscal year.

By: 6/30/04 and 6/30/05

Leaking Underground Storage Tank (LUST)s

PPG (Y/N): N

Ensure mitigation, remediation and closure of Leaking Underground Storage Tank (LUST) sites.

By: 6/30/04 and 6/30/05

Approve two hundred and fifty (250) site characterizations each fiscal year.

By: 6/30/04 and 6/30/05

Approve two hundred and fifty (250) corrective action plans each fiscal year.

By: 6/30/04 and 6/30/05

Approve two hundred and fifty (250) closures.

By: 6/30/04

Approve three hundred (300) closures.

By: 6/30/05

Voluntary Remediation

PPG (Y/N): N

Increase participation into the Voluntary Remediation Program by fifty (50) sites each fiscal year.

By: 6/30/04 and 6/30/05

Cost Recovery

PPG (Y/N): N

Support the evaluation of current cost recovery efforts and provide recommendations to senior management.

By: 6/30/04 and 6/30/05

2.2.7.4. Permits Branch Priorities

Hazardous Waste Permitting

PPG (Y/N): Y

Complete twelve (12) hazardous waste facility permitting actions per fiscal year, in accordance with the annual work plan. Two (2) of the permitting actions will address GPRA first-time post closure enforceable instruments, while one (1) will address first-time full facility permits. Permits will be issued in accordance with the process specified by hazardous waste management regulations and applicable non-rule guidance. Each permit issued will address corrective action requirements. Sites subject to corrective action that are not addressed by permit will be covered by an order in accordance with annual work plan schedules.

By: 6/30/04 and 6/30/05

An annual work plan will be provided to U.S. EPA Region 5 EnPPA coordinator for state fiscal year 03-04 and state fiscal year 04-05.

By: 6/30/04 and 6/30/05

For Resource Conservation and Recovery Act (RCRA) Corrective Action meet RCRA CA/GPRA commitments.

By: 6/30/04 and 6/30/05

Hazardous Waste Closures

PPG (Y/N): Y

Approve twelve (12) hazardous waste closure plans/certifications per fiscal year. Closure plans will be approved in accordance with hazardous waste management regulations and applicable non-rule guidance.

By: 6/30/04 and 6/30/05

2.2.7.5. Compliance and Response Branch Priorities

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of TSD's

PPG (Y/N): Y

EPA Role: Conduct Inspections at three State and local installations and at three Federal facilities. In addition, Region 5 will independently inspect the boiler and industrial furnace units at five TSDs. Eight IDEM/Region 5 joint inspections will be conducted at installations within U.S. EPA's national priority sectors which handle certain commercial and/or industrial wastes in ways that illegally evade RCRA requirement for permits. Other IDEM/Region 5 joint inspections will be conducted at five TSDs and one LQG.

Each fiscal year, IDEM will inspect all TSD's with a current operating permit for active permitted units.

By: 6/30/04 and 6/30/05

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Generators

PPG (Y/N): Y

Annually, IDEM will inspect at least 20% of the large quantity generator universe that exists as of June 1 of that respective year, as identified in the EPA RCRAInfo database. Annually, IDEM will inspect at least 10% of the small quantity generator universe that exists as of June 1 of that respective year, as identified in the EPA RCRAInfo database.

By: 6/30/04 and 6/30/05

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Newport Chemical Depot

PPG (Y/N): N

IDEM will conduct RCRA inspections at the Newport Chemical Depot. IDEM anticipates conducting a diligent compliance oversight program of the VX neutralization project at the Newport facility. The resource commitment is expected to be significant. Inspections will be conducted by an experienced team at a frequency which provides assurance that activities are protective of human health and the environment, and may include daily inspections if necessary. To safely and successfully implement this program, staff will complete additional medical screening, security screening, and training requirements.

By: 6/30/04 and 6/30/05

Underground Storage Tank (UST) Inspections

PPG (Y/N): N

Conduct 1,000 Underground Storage Tank (UST) inspections of regulated facilities each fiscal year for a total of 2,000 inspections.

By: 6/30/04 and 6/30/05

Work to ensure all new and unregistered tanks are properly registered.

By: 6/30/04 and 6/30/05

Complete and submit to U.S. EPA Region 5 the Underground Storage Tank (UST) Semi-annual Performance Measures Report (STARS). The report will be submitted in October and April each fiscal year.

By: 4/30/04 and 4/30/05

Complete and submit to Region 5 the report Significant Operational Compliance UST Performance Measures Matrix. This report will be submitted in October and April of each fiscal year.

By: 4/30/04 and 4/30/05

Confined Feeding Operation Inspections

PPG (Y/N): N

IDEM will conduct comprehensive inspections of at least 20% of Concentrated Animal Feeding Operations (CAFO's) each fiscal year. In addition to the 20% of CAFO's, inspections will be conducted at confined feeding operations (state permitted sites) in response to complaints and any new construction sites. The inspections include operational requirements and nutrient management requirements for land application.

By: 6/30/04 and 6/30/05

The implementation of National Pollutant Discharge Elimination System (NPDES) program at Concentrated Animal Feeding Operations (CAFOs) will be evaluated during FY 2004.

By: 6/30/04

Participate with EPA Region 5 in the Multi-State/Federal investigation of Vreba-Hoff Dairy Development animal feeding operations.

Work with EPA Region 5 to develop and implement a Concentrated Animal Feeding Operation Inspection Check List (to be incorporated in the States Inspections). Check lists need to be developed to determine if a facility is a CAFO requiring an NPDES permit and also the check compliance with NPDES permit requirements.

CFO Construction Inspections

PPG (Y/N): N

IDEM will conduct construction inspections at 100% of all Confined Feeding Operation (CFO) construction sites based on their start of construction notification during each fiscal year.

By: 6/30/04 and 6/30/05

PCB Inspections

PPG (Y/N): Y

IDEM will conduct 38 PCB inspections during FY 2004 and 38 PCB inspections during FY 2005. Results of PCB inspections are forwarded to EPA for the appropriate action.

By: 6/30/04 and 6/30/05

Compliance/Enforcement Team

PPG (Y/N): N

Participate in the agency-wide Compliance/Enforcement Team to communicate activities, evaluate information and formulate agency-wide strategies and resource allocation.

By: 6/30/04 and 6/30/05

Emergency Response

PPG (Y/N): N

Participate in developing and updating multi-agency counter—terrorism response plans and all hazards plans. (Indiana State Agency Comprehensive Emergency Management Plan (CEMP), U.S. EPA Area Contingency Plans for Indianapolis and Louisville, Board of Animal Health Foreign Animal Disease Plan, Indiana Continuity of Government Plan)

During: FY 2003 – 2005

Contribute to the design and participate in local, state, and federal counter-terrorism and hazmat response and recovery exercises. (Chemical Stockpile Emergency Preparedness Plan (CSEPP (VX)), Operation River City (Louisville), Hoosier Guardian, Local Emergency Planning Committee exercises, Pipeline Group tabletops)

During: FY 2003 – 2005

Participate in multi-agency counter-terrorism and hazmat response forums (Counter-Terrorism and Security Council, Safe Schools Advisory Council, Purdue University Homeland Security Institute, U.S. EPA Region 5 Regional Response Team.)

During: FY 2003 – 2005

Provide staff and support to the Indiana Emergency Response Commission

During: FY 2003 – 2005

Provide after hour's duty roster of IDEM staff to State Emergency Management Agency (SEMA) for staffing SEMA's Emergency Operations Center.

During: FY 2003 – 2005

Participate in State Emergency Management Agency advisory committee regarding Federal Emergency Management Agency and Department of Justice counter-terrorism grants.

During: FY 2003 – 2005

2.2.7.6. Science Services Branch Priorities

Great Lakes Initiative (GLI)

PPG (Y/N): Y

Provide technical and mapping support for IDEM Remedial Action Plan activities in the Area of Concern (AOC) through the following activities.

Develop an annual IDEM Great Lakes Initiative Strategic Plan by May 1 of each fiscal year.

```
By: 5/1/04 and May 1, 2005
```

Provide technical and financial support to non-governmental organizations, state and local government entities, federal agencies, research institutions, and other non-IDEM cooperators working to improve the environmental quality in the Area of Concern (AOC) and the Great Lakes Drainage Basin in Indiana.

```
Ongoing
```

Provide technical and financial support for IDEM offices and initiatives working to improve the environmental quality in the Area of Concern (AOC) and the Great Lakes Drainage Basin in Indiana.

```
Ongoing
```

Prepare and present to EPA an annual report on Great Lakes Initiative activities for each fiscal year.

By: 12/1/04 and 12/1/05

RCRA Info
PPG (Y/N): N

Resource Conservation and Recovery Act (RCRA) information will be input into the RCRA Info database on a monthly basis.

By: Monthly

IDEM will post RCRA Info data to the IDEM National Environmental Information Exchange Node (NEIEN) upon completion of the IDEM Node.

By: November 2005

IDEM will modernize the Agency's RCRA Info system / Indiana RCRA Activity Tracking System (IRATS) to be compliant with the Facility Information Template for States II (FITSII) and the Indiana Facility Registry System (IFRS) by June 30, 2006 provided that adequate funding is available.

By: 6/30/06

2.2.7.7. Rules, Planning and Outreach Section Priorities

Rule Development PPG (Y/N): Y

IDEM will promulgate and pursue authorization for all RCRA subtitle C and I rules.

During: FY 2003 - 2005

Develop equivalent legislation, regulations and program revision applications for RCRA and Hazardous and Solid Waste amendments (HSWA) / non-HSWA provisions for which the state is prepared to seek authorization and submit current and future authorization packages with in a mutually agreed upon time frame.

By: EPA and IDEM mutually agreed upon time frame.

2.2.8. Office of Legal Counsel

The Office of Legal Counsel (OLC) provides legal advice and representation to the Department of Environmental Management (IDEM). Most of the attorneys working in OLC are environmental law specialists, though some of the attorneys also specialize in contract and employment law in order to fully represent the legal needs of IDEM. (Statutory Authority IC 13-13-3-3)

Office Contact

Felicia Robinson
Office of Legal Counsel
(317) 233-3978

e-mail: frobinso@dem.state.in.us

OLC is divided into five functional sections: Program Counsel, Rules and Legislation, Enforcement, Remediation and Litigation. Each attorney and many of the office's support staff are assigned to work in one of these five sections. Each section has a supervising attorney (Section Chief) who manages the responsibilities of the section.

2.2.8.1. Agency Priorities

Improve Rulemaking Process

Lead Office: OPPP/OLC

Evaluate administrative, rule writing, publication, programmatic and external aspects of rulemaking and make recommendations for revisions to current organization and management of rulemaking.

Complete evaluation

By: 10/1/03

Participate in EQSC Discussions related to rulemaking. Implement recommendations approved by Commissioner.

By: 12/1/03

2.2.9. Office of Management, Budget, and Administration

2.2.9.1. Office of Fiscal Policy and Accounting

The Office of Fiscal Policy and Accounting is responsible for establishing fiscal policy, oversight of financial operations, and the processing of financial instruments. The office is comprised of three sections: Billing and Accounts Receivable, Accounts Payable, and Financial Oversight and Reporting. The Billing and Accounts Receivable area is

Office Contact

Ryan Pastorius Controller Office of Fiscal and Accounting (317) 233-6735

e-mail: rpastori@dem.state.in.us

primarily responsible for producing invoices, depositing all revenue, and assisting in the agency's cost recovery efforts. The Accounts Payable section is responsible for making the payment of invoices by ensuring that all state laws and regulations for making payments are adhered to, and that all documentation is in proper order. The Financial Oversight and Reporting section is primarily responsible for reviewing and analyzing the status of all agency accounts for the program areas of the agency, and ensuring that payments are being charged to the appropriate account or grant.

2.2.9.1.1. Agency Priorities

Study Financial Management Information System

Study all currently available modules and features of the Peoplesoft© Financial Management System to determine if additional capabilities can result in greater efficiencies for IDEM processes.

By: 4/1/04

Report on the results of the study and make recommendations to senior staff on any additional features that should be further pursued.

By: 6/1/04

Develop an implementation proposal for any features that were recommended for implementation. This proposal will include any changes to current business practices that will be needed to implement the additional features of Peoplesoft©.

By: 9/1/04

Present any implementation proposals to senior staff and begin the implementation process for any proposals that are approved.

By: 10/1/04

2.2.9.1.2. Office Priorities

Grant Management PPG (Y/N): N

EPA Role:

- 1.) Assist in gathering information for study, and providing some training for the positions designated as having grant oversight responsibilities in IDEM.
- 2.) Coordinate with IDEM to determine cooperative methods to improve the grant submittal process.
- 3.) Work with IDEM to improve the cash management system.

Study the current grant oversight and training processes in IDEM and develop a report on the processes including any recommended changes.

By: 1/1/04

Develop a proposal to address any weaknesses in the current system as identified by the report.

By: 4/1/04

Evaluate the proposals and decide which proposals can be implemented without outside assistance. Begin implementing all proposals that do not rely on outside assistance, and begin to work with external shareholders to implement those proposals which will require outside assistance.

By: 7/1/04

Minority Business Enterprise (MBE) / Women's Business Enterprise (WBE) Audit

PPG (Y/N): N

EPA Role: Assist in gathering information for study, and providing some training for the positions designated as having grant oversight responsibilities in IDEM.

Review the current Minority Business Enterprise (MBE) / Women's Business Enterprise (WBE) reporting system for the agency.

By: 1/1/04

Issue a report detailing the strengths and weaknesses of the current reporting system.

By: 2/1/04

Develop a proposal to address the weaknesses of the current system.

By: 4/1/04

Begin to implement all aspects of the proposal that will not require outside assistance, and begin to work with outside shareholders to implement any aspects of the proposal that require outside assistance.

By: 7/1/04

2.2.9.2. Human Resources Management Office

The Human Resources Management Office provides services to IDEM staff in the areas of Employment and Recruiting, Equal Employment Opportunity, Employee and Labor Relations, Compensation, Benefits, Training and Development. Our mission is to provide quality customer service as it relates to each Human Resource function and to take positive

Office Contact

Brandye Hendrickson, Director Human Resources Management Office 100 N. Senate Ave. N1322 Indianapolis, IN 46206 (317) 233-1785 bhendric@dem.state.in.us steps toward ensuring the organization's success while closely following applicable state and federal employment law.

2.2.9.2.1. Agency Priorities

Building a Better IDEM – Workforce Development – Focus on Supporting our Workforce

Facilitate management panel discussions/focus groups to encourage management participation: As new policies are developed, Human Resources will solicit input from managers.

By: 12/31/03

Hold employee sounding sessions and manage open forums: As new policies and procedures are distributed, Human Resources will hold sounding sessions and open forums where information can be exchanged and questions can be answered.

By: 12/31/03

Building a Better IDEM – Workforce Development – Research Options for Conducting "360-Degree" Evaluations

Human Resources will research available software, other agencies' procedures and ways to give effective feedback to supervisors.

By: 6/30/04

Building a Better IDEM – Workforce Development – Succession Planning

Develop internal leadership training: Human Resources will research and provide options to Senior Staff for leadership training.

Options researched by 12/31/03 First session held by 12/31/04

Develop knowledge retention system to deal with employee turnover and retirement:

Human Resources will develop a tool for supervisors to help capture the patterns, processes and skills of high performing employees to prevent loss of valuable knowledge upon resignation or retirement.

Tool developed

By: 6/30/04

Building a Better IDEM – Communication Training

Human Resources will assist MACS with the scheduling of training classrooms and material, and will maintain attendance rosters. Human Resources will also incorporate the training in the Quarterly Training Calendar.

Ongoing through 8/1/04

Building a Better IDEM - Implement any potential organizational changes to enhance efficiencies

Human Resources will work with program areas to review organizational structures and provide guidance on potential reorganization packages.

Guidance accessible:

By 12/31/03

Coalition Building – Partnering with universities on research and technical issues - Establish Industrial Pollution Prevention Internships

Human Resources and Office of Pollution Prevention and Technical Assistance will work together to consider the development of an internship program with Office of Pollution Prevention and Technical Assistance/Clean Manufacturing Technology Institute. Work with Clean manufacturing Technology Institute to evaluate the possibility of a college pollution prevention internship program. This program would allow engineering students to assess participating facilities for pollution prevention opportunities.

By: 6/30/04

2.2.9.3. Office of Business Services

The Division of Business Services encompasses a wide range of specialty services for the Indiana Department of Environmental Management.

The offices included in this division are:

- Information Technology,
- Administrative Services,
- Distribution, Purchasing, and
- Contracts Administration.

Office Contact

Laurie Beamish

Director

Business Services Division

(317) 232-7010

e-mail: lbeamish@dem.state.in.us

These offices are critical to the daily internal operations of IDEM. As the agency grows, and during expansion into regions of Indiana, these offices are responsible for all communication functions, and purchasing goods and services via procurement or contractual methods. In addition, staff are dedicated to making offices functional and comfortable for employees and the public.

2.2.9.3.1. Agency Priorities

Centralized Web Development

Goal: Centralize Web site development/maintenance to integrate program area web pages. This will require the creation of a Web Technical Team.

Improve management of environmental data, and build foundation for future data integration efforts:

- Indiana Facility Registry System (I-FRS)
- Geography Network
- Document Management System (DMS)
- Other Office/Data Specific integration efforts

EPA Role: Region 5 will assist IDEM in applying for Challenge grants.

OMBA - BSD: Co-lead on this priority with Office of Planning and Assessment, and provide Information Technology consultants to guide database development. Provides ongoing assistance and review on development of standards, standard operating procedures, and process that pertain to the Data Management Team and to agency data management.

Agency Data Integration / Data Management Team

Continue efforts of the Data Management Team. The Team ensures that new and enhanced data integration projects are consistent with guiding data management policies. The team also develops and, throughout their office, proactively implements standards pertaining to data management. Continue to provide policies, standards, procedures, and guidance for data management practices.

Ongoing through 6/30/05

Establish Indiana Facility Registry System (I-FRS):

Provide IT project management, support, and application development.

Staff from the Office of Management and Budget Administration (OMBA) Information Technology section and the Office of Planning and Assessment (OPA) will oversee development of, and will implement the Indiana Facility Registry System (I-FRS) to facilitate the exchange of facility data between IDEM and EPA and promote quality environmental data.

By: 6/30/05

Geography Network

OMBA - BSD: Priority lead. Project coordination. Participate in development of metadata development plan and implement Web Based service.

Each Office will inventory existing Geographic Information System (GIS) data.

By: 6/30/03

Agency Geographic Information System (GIS) Coordinators, with assistance and input from Agency GIS Tech Workgroup composed of Office GIS data Contacts, will develop plan for creating metadata for program developed data.

By: 10/1/03

Information Technology Geographic Information System (GIS) staff will develop Geography Network service on IDEM Intranet ArcIMS Server.

By: 12/31/03

IDEM Geography Network made available to State Government Network.

By: 3/31/04

Document Management System (DMS)

Deploy DMS in 25% of the Agency

By: 8/31/03

Deploy Document Management System in 50% of the Agency

By: 1/31/04

Deploy Document Management System in 75% of the Agency

By: 8/31/04

Deploy Document Management System in 100% of the Agency

By: 12/31/04

Focus on records management issues to include record retention schedules.

Develop and implement a retention schedule and agency policy for the electronic filing of e-mails. This will assist with reducing the time and effort currently expended for Public Information requests as well as court requests for e-mail.

Develop record retention policy (including e-mails and electronic documents)

By: 12/31/03

2.2.9.3.2. Office Priorities

Update the Shadeland Network

PPG (Y/N): N

Due to bandwidth demands for Geographical Information Systems (GIS) and other environmental application systems, our Local Area Network (LAN) located at our Shadeland Avenue site needs to be upgraded. The move from hubs to switches will increase the bandwidth available to staff and will allow them to access and process data at that site as well as at our Indiana Government Center site quickly. This will also allow us to leverage the investments made in processors, switches and storage (SAN).

Upgrade completed.

By: 12/1/04

Replace Outdated Computer Equipment

PPG (Y/N): N

Replace one-third of the out of warranty computers within the agency in order to maintain staff efficiency as well as reduce maintenance costs due to inadequate or outdated equipment.

By: 6/30/04

Replace Outdated Vehicles

PPG (Y/N): N

Over 25% of our vehicle fleet have over 100,000 miles on them. The agency will attempt to replace approximately half of the vehicles over 100,000 miles. This will help to eliminate expensive maintenance on these well worn vehicles as well as ensure staff are traveling in reliable vehicles.

Вν	v: 6/30/04		
_,	. 0,00,0.		

2.2.10. Northern Regional Office

The Northern Regional Office brings many of IDEM's services to the citizens and communities of Northern Indiana. Serving the counties of DeKalb, Elkhart, Fulton, Kosciusko, Lagrange, Marshall, Noble, St. Joseph, Starke, and Steuben, the Northern Office helps to bring environmental assistance from the State Capitol in Indianapolis to Northern Indiana

Office Contact(s):

Terry Coleman Director Northern Regional Office Phone: 219-245-4870

e-mail: tcoleman@dem.state.in.us

residents, municipalities, counties, and planning districts.

Providing access to local permits, inspection reports, and general environmental information is but one of the areas of support that we bring to our region; local compliance and technical assistance to industries and groups starting to build, expand, or diversify their plants, and initiating and developing outreach services in environmental issues are among other services we provide.

2.2.10.1. Office Priorities

Water Quality PPG (Y/N): Y

Complete Northern Regional Office portion of the Office of Water Quality's wastewater inspection commitments for both major and minor municipal and industrial permitted facilities (i.e., 70% of its majors, 30% of its minors).

By: 6/30/04 and 6/30/05

Conduct 114 site visits and reconnaissance inspections in the Northern Region

By: 6/30/05

Investigate 100% of wastewater complaints concerning the Northern Region, during the fiscal year.

Ongoing through 6/30/05

Complete Northern Regional Office portion of the Office of Water Quality's Drinking Water section's compliance goals.

Inspect 100% of the assigned Community Public Water Systems listed by the Safe Drinking Water Information System (SDWIS) system in the Northern Region. (Community systems inspections every 3 - 5 years).

By: 6/30/05

Conduct 500 site visits of community, transient and non-transient water systems in the Northern Region.

By: 6/30/05

Investigate 100% of drinking water complaints concerning the Northern Region, during the fiscal year.

Ongoing through 6/30/05

Northwest Regional Office will conduct comprehensive inspections of 20% of confined feeding operations within the region each fiscal year.

By: 6/30/04 and 6/30/05

2.2.11. Northwest Regional Office

Some of the state's most serious environmental challenges lie in Lake, LaPorte and Porter counties in Northwest Indiana. A century of spills, emissions and discharges to the environment required government to respond with comprehensive, regionally coordinated programs. In 1991, IDEM opened a regional office in Gary to act as a liaison

Office Contact(s):

Vacant Director Northwest Regional Office (219) 881-6712 e-mail:

with local officials, concerned citizens, and industry. Today, the Northwest Regional Office has extended its service to assist Starke, Pulaski, Newton and Jasper counties in some areas of environmental compliance. Northwest Regional Office staff communicate agency programs and rules to the public; address issues through a multi-media lens; and participate in various regional environmental planning efforts.

2.2.11.1. Office Priorities

Coke oven compliance oversight

PPG (Y/N): N

EPA Role: Support state efforts to transfer oversight of coke oven compliance program to IDEM from coke plants.

Northwest Regional Office is taking a lead role in developing and implementing a compliance program that provides IDEM oversight of contracts for daily observations of coke ovens at Indiana facilities.

The compliance program includes discussions with coke oven facilities, development of a contract for the program, selection of vendor(s), completion of the contract, establishment of a billing system and implementation and oversight of the contract activities.

By: 6/30/04

Air Compliance

PPG (Y/N): N

EPA Role: Oversee States' implementation of Clean Air Act

Inspect 95% of all permitted sources and conduct full compliance evaluations on all Title V and Federally Enforceable State Operating Permit (FESOP) sources. Respond to complaints in a timely fashion. Assist the Clean Fuel Fleet program. Inspect 10% of the sources subject to the auto-refinishing rule and inspect at least two wholesale paint distributors.

By: 6/30/04 and 6/30/05

Maintain Ambient Air Monitoring Network

PPG (Y/N): N

EPA Role: Ensure air monitoring network follows Federal requirements.

Operate ambient air monitoring network in accordance with state and federal guidelines to provide timely and accurate air quality data.

Ongoing

Underground Storage Tank (UST) Inspections

PPG (Y/N): N

Complete Underground Storage Tank (UST) inspections at regulated facilities and work to ensure all new and unregistered tanks are properly registered. Investigate complaints.

By: 6/30/04 and 6/30/05

Industrial Waste Inspections

PPG (Y/N): N

EPA Role: Ensure State meets RCRA compliance inspection goals.

Conduct industrial waste inspections at facilities that manage hazardous waste, including landfills, transportation, storage and disposal facilities; and waste generators. Conduct Polychlorinated Biphenyls (PCB) inspections.

Ongoing

Agriculture and Solid Waste Inspections

PPG (Y/N): N

EPA Role: Partial - Ensure State meets Federal Confined Animal Feeding Operation (CAFO) requirements.

Conduct inspections of solid waste landfills, land application sites, and septic haulers. Investigate complaints.

By: 6/30/04 and 6/30/05

Northwest Regional Office will conduct comprehensive inspections of 20% of confined feeding operations within the region each fiscal year.

By: 6/30/04 and 6/30/05

Wastewater Compliance

PPG (Y/N): N

EPA Role: Oversee State implementation of National Pollutant Discharge Elimination System (NPDES) program

Investigate complaints. Routinely inspect wastewater treatment plants that have combined sewer overflows. Respond to stormwater complaints. Help review combined sewer overflow long-term control plans. Review draft National Pollutant Discharge Elimination System permits by using compliance information to assist permit writer in developing permit requirements.

By: 6/30/04 and 6/30/05

Complete Northwest Regional Office portion of the Office of Water Quality's wastewater inspection commitments for both major and minor municipal and industrial permitted facilities (i.e., 70% of its majors, 30% of its minors).

By: 6/30/04 and 6/30/05

2.2.12. Office of Planning and Assessment

The IDEM Office of Planning and Assessment directs IDEM's planning and assessment activities to support the agency mission and agency-wide priorities. The Office directs the development of short and long-term plans for the agency and guides agency-wide priorities that require coordination amongst IDEM's media and support offices.

Office Contact(s):

Paula Smith
Director
Office of Planning and Assessment
(317) 233-1210
e-mail: psmith@dem.state.in.us

OPA coordinates and manages the agency quality system (as described in the agency's Quality Management Plan) and the Environmental Performance Partnership Agreement (EnPPA). The OPA also coordinates with state agencies and the U.S. Environmental Protection Agency on environmental strategies and planning.

2.2.12.1. Agency Priorities

Building a Better IDEM – Centralized Web Development

Lead Office: MACS/OMBA-BSD

Office of Planning and Assessment will designate staff to act as "Content Managers" to represent the office. The content manager will be responsible for ensuring that materials posted to the Web from Office of Planning and Assessment are appropriate and current, and will assist staff within the office in posting new content. The content manager will also assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to MACS.

Share information on office publications for use in the on-line publication catalog/archive.

Building a Better IDEM – Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD / OPA

Co-lead on this priority with IT. Provide brief incoming introductory data stewardship training for new staff entering into positions where data entry is required. Office Data Contact (ODC) to actively participate in data management team meetings and activities regarding the agency's data integration effort. Office Data Contact (ODC) to actively participate in Data Management Team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. Office Data Contacts will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance.

Ongoing through 6/30/05

Building a Better IDEM – Establish Facility Registry System (I-FRS)

Lead Office: OPA/OMBA-BSD

OPA will:

- Provide business process management and project oversight.
- Develop standard operating procedures and agency policy dictating Data Steward standards.
- Train all existing data steward staff in the use of the developed SOPs and agency policies associated with the Indiana Facility Registry System.
- Continue to apply for Readiness Grant Funding from the National Environmental Information Exchange Network (NEIEN).

Ongoing through 6/30/05

Building a Better IDEM – Address Quality Issues – Quality Management Plan

Lead Office: OPA

EPA Role: EPA Region 5 will provide the IDEM QA Manager with relevant information about quality related issues; act as coordinator and conduit for Region 5 State Science Council research and educational activities; and provide guidance on implementing peer review policies and procedures.

* EPA Region 5 will provide guidance on the use of quality assurance tools and procedures required to evaluate the effectiveness of IDEM's Quality system, as well as having a role in actually monitoring and assessing IDEM's Quality System and Quality Management Plan.

Continue implementation of management and technical quality assurance and quality control policies and procedures throughout the agency as described by the agency Quality Management Plan (QMP).

Ongoing through 6/30/05

Quality Assurance (QA) assessment of IDEM's Quality System and Quality Management Plan to include expansion of IDEM QA Team and hold at least quarterly meetings; develop implementation and assessment phase policies and procedures for ensuring consistency of quality assurance practices throughout the agency; perform annual QMP and Quality System review and report to IDEM management and EPA Region 5; and develop a plan and timeline for performing other technical and management assessment processes throughout IDEM program offices.

Ongoing though 6/30/05

Manage quality-related documents, to include the tracking of Quality Assurance Project Plans (QAPPs), in the agency QAPP tracking database; the listing of Standard or Current Operating Procedures (SOPs/COPs), as well as the listing of the myriad of other technical, guidance and non-rule policy documents used within the agency; and identify any 'new' quality-related documents, grants, contracts, and programs that must be referenced in the agency QMP.

By: 6/30/05

Communicate quality-related information by participating in monthly or bimonthly meetings with Region 5 State Science Council. Per our commitment in the QMP, participate in the IDEM 'peer review' panel that will be assembled to develop agency-wide policies and procedures to review and approve study plans and reports for major special studies and other technical documents for publication and distribution. An agency-wide peer review policy and implementation timeline will also be developed.

Ongoing though 6/30/05

Building a Better IDEM - Develop IDEM Strategic Plan

Lead

Office: OPA

Develop/refine a new strategic plan for IDEM to guide future agency initiatives.

Due Date / Through: 6/30/04

Coalition Building - Reducing Environmental Asthma Triggers

Lead Office: OPA/OAQ

EPA Role: Grant funding. Advisor to the Environmental Quality Workgroup.

Work with InJAC to reduce asthma effects on children

IDEM will work with its co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees. IDEM will:

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems.

By: 10/31/03 By: 2/29/04

Work with the Environmental Quality committee to access information and evaluate the environment in Indiana, using available information, to develop recommendations to identify known and potential indoor/outdoor environmental triggers for asthma, and to identify strategies and develop tools for organizations to reduce exposures to asthma triggers.

By: 6/30/05

Establish a comprehensive plan to reduce the burden of asthma in four sets of age groups of children: reduce encumbrance of asthma for children; and develop a comprehensive asthma surveillance system for each of the four age groups.

By: 6/30/05

Develop educational material regarding environmental triggers of asthma and distribute to childcare facilities and other interested parties. (Indiana Recycling Initiative (SIRI), Northern Indiana Recycling Initiatives (NIRI), Association of Indiana's Solid Waste Management Districts (AISWMD), Indiana Association of Cities and Towns (IACT))

By: 6/30/05

Coalition Building - Environmental Education

Build on environmental education efforts

Lead Office: OPA

EPA Role: Funding, guidance

IDEM will continue to build on its efforts to educate citizens about environmental issues and ways to become involved in environmental protection.

The agency will accomplish this by:

Expanding IDEM's education and outreach efforts by encouraging environmental experts, including staff chemists, geologists, and other scientists to make school presentations as partners with OPA's Education Team.

By: 6/30/05

Coordinating IDEM school presentation resources and materials, including Earth Week presentation kits and IDEM exploration books.

By: 6/30/05

Assisting in outreach events, such as, Earth Day Indiana, the Hoosier Association of Science Teachers (HASTI) convention, the Indiana Youth environmental Summit (IYES), the Indiana State Fair, and Indiana Recycling Coalition (IRC) education sessions.

Ongoing

Developing and distributing information regarding mercury, asthma, and child care facility programs to children, parents, and educators.

Ongoing

Distributing home self-assessment booklet and IDEM supplement for potentially harmful items found in the home to citizens and schools.

By: 6/30/05

Maintain Essential Environmental Services – Agency-Wide Permit Team

Lead: Deputy Commissioner / OPA

Ongoing through 6/30/05

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Maintain Essential Environmental Services – Agency-Wide Permit Team

Lead: Deputy Commissioner / OPA

Ongoing through 6/30/05

Enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Establish IDEM Permit Team, consisting of key permit managers and support managers to steer process, administrative and program improvements and efficiencies.

By: 10/1/03 - Establish Team

12/1/03 - Establish Team Workplan 1/20/04 - Implement Workplan

Maintain Essential Environmental Services - Internet public notice standardization

Lead Office: OPA

Work with the program areas to improve and standardize methods of posting permitting decisions for public notice on the Internet.

Ongoing through 6/30/05

Assemble a workgroup to evaluate, improve, and standardize the way public notice information for permits is posted to the Web.

By: 4/30/04

Investigate possibility of establishing a centralized/cross-program public notice website for the agency. Evaluate options and compile recommendations for next steps.

By: 9/30/04

Coordinate and implement plans devised by the workgroup.

By: July 31, 2005 (Dependent upon decisions made by the workgroup)

Develop standard operating procedures (SOPs) for standardized processes developed and train affected employees and document training with HR and respective program office employee files.

By: 7/31/05 (Dependent upon decisions made by the workgroup)

Maintain Essential Environmental Services - Compliance / Enforcement Team

Lead: OE

Routinely participate in CE Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Ongoing through 6/30/05

Reducing Key Environmental Threats –Risk Advisory Committee

Lead Office: OPA

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Due Date / Through: 6/30/05

Lead by OPA, IDEM program offices, OAQ, OLQ, OWQ and OPPTA, will work to:

Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list

By: 12/30/03

Develop a process to make better risk-based decisions and allocation of resources

By: 6/30/04

Assist other IDEM offices in addressing their priority contaminants

By: 6/30/05

Participate in agency-wide meetings

Through 6/30/05

Reducing Key Environmental Threats – Environmental Risks - Address Mercury Issues

Lead Office: OPA/OAQ

IDEM has assembled a mercury workgroup to address mercury concerns.

Mercury is a priority chemical based on concern over human exposure, available data, multimedia issues and a focus to reduce the release of mercury into the environment - especially where kids are present.

As an agency, IDEM will focus on:

Implementing recommendations for next steps to reduce mercury emissions.

Through: 6/30/05

Developing overall multi-media mercury reduction plan, identifying the various mercury "loads".

Through: 6/30/05

Continuing implementation of the mercury deposition monitoring project and analysis of data in coordination with United States Geological Survey and issue final report.

Through: 6/30/05

Mercury Inventory and Data Analysis

Gather and analyze mercury data to provide key information to guide IDEM's mercury water quality planning efforts, a part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, and fish tissue sampling data.

Chart USGS data and Cross reference USGS data with IDEM data.

By: 9/30/04

List Mercury (Hg) reduction actions/projects IDEM has already taken.

By: 10/31/03

Get latest (2000) rapids (EPA) data and analyze it to compare with 1997 and 1999 rapids data (this data is released biennially).

By: 10/31/03

Assess impact of more stringent federal rules on medical waste incinerators.

By: 12/31/03

Gather available data on reported Hg discharges from Indiana publicly owned treatment works (POTWs).

By: 6/30/05

In conjunction with the wastewater triennial review, determine, as fully as possible, the various sources of Hg in the influent of POTWs.

By: 12/31/04

Mercury Exposure and Education

Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Ongoing through 6/30/05

Mercury Thermostat Reduction & Recycling Program

Continue to promote and manage the thermostat program and attend HVAC-R (heating, ventilation, air conditioning and refrigeration) association meetings.

Through: 6/30/05

Conduct annual outreach to the thermostat program participants to ensure they are properly serviced by the Thermostat Recycling Corporation and that they have an adequate supply of IDEM promotional materials.

By: 6/30/04 and 6/30/05

Dental Mercury Program

Work with the Indiana Dental Association, the Indiana State Department of Health, and other interested parties to develop an environmental pledge program for Indiana dentists. In addition to mercury, the pledge will address lead and silver.

By: 6/30/04

Working with the Indiana Dental Association, and the Indiana State Department of Health, conduct outreach to Indiana Dentists to encourage them to participate in the pledge program.

By: 10/31/04

Upon request, assist Indiana dentists by providing information and assistance as they work to join the pledge program. This may include site visits, providing information, and/or developing guidance documents.

Through: 6/30/05

Work with the Indiana Solid Waste Management Districts (SWMDs) to coordinate the proper management of dental waste. Assist participating dentists with finding proper vendors for their waste.

Through: 6/30/05

Mercury Deposition Monitoring

Continue and complete implementation of mercury deposition monitoring project; complete analysis of data in coordination with United States Geological Survey, issue final report.

Through: 6/30/05

Mercury Switch Removal

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

Mercury & Schools

Lead the school mercury reduction and recycling pledge program. Conduct outreach campaign and offer assistance to schools, SWMDs, and the City of Indianapolis where needed.

Through: 6/30/05

Reducing Key Environmental Threats – Environmental Risks - Enviro-School Program

Lead Office: OPA

EPA Role: Provide funding and guidance.

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

Due Date / Through: 6/30/05

Reducing Key Environmental Threats – Environmental Risks - Address Potential Environmental and Health Threats in Homes and Communities

Lead Office: OPA

Expand the Children's Health Program:

Partner with the Indiana State Department of Health and Indiana Family Social Services Administration to expand the Children's Health Program on areas such as asthma triggers, integrated pest management practices, lead prevention to include sensitive populations located in long-term care facilities, hospitals and rehabilitation centers.

By: 12/1/04

Reducing Key Environmental Threats – Environmental Risks - Integrated Pest Management (IPM)

Lead Office: OPA

Work with schools and child care facilities and the Indiana Family and Social Services Administration to implement the IPM model that was developed from the pilot project.

Ongoing through 6/30/04

IPM curriculum

Publish IPM curriculum

Conduct outreach to childcare facilities and schools

By: 6/30/05

Reducing Key Environmental Threats – Environmental Risks - Reduce Diesel Emissions

Lead Office: OAQ/OPA

Enhance diesel emissions reduction efforts by working to develop and implement projects to reduce emissions from diesel sources, including school bus anti-idling pilots, school bus and/or municipal fleet retrofit projects, truck stop electrification project and development of web-based diesel emissions resource center.

- Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

- Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

- Develop and distribute marketing materials for this volunteer program.

By: 6/30/05

- Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

2.2.12.2. Office Priorities

Address Potential Environmental and Health Threats in Homes and Communities

PPG (Y/N): N

Expand the Children's Health Program:

Partner with the Indiana State Department of Health and Indiana Family Social Services Administration to expand the Children's Health Program on areas such as asthma triggers,

integrated pest management practices, lead prevention to include sensitive populations located in long-term care facilities, hospitals and rehabilitation centers.

By: 12/1/04

Integrated Pest Management (IPM)

PPG (Y/N): N

Work with schools and child care facilities and the Indiana Family and Social Services Administration to implement the IPM model that was developed from the pilot project.

Ongoing through 6/30/04

IPM curriculum

PPG (Y/N): N

Publish IPM curriculum. Conduct outreach to childcare facilities and schools.

Asthma [and Indiana Joint Coalition for Asthma (InJAC)]

EPA Role: Grant funding. Advisory role for the Environmental Quality Workgroup.

Work with co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees.

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems

Research by 10/31/03 (OAQ)

Development by 2/29/04 (OPA)

Work with the Environmental Quality committee to access information and evaluate the environment in Indiana, using available information, to develop recommendations to identify known and potential indoor/outdoor environmental triggers for asthma, and to identify strategies and develop tools for organizations to reduce exposures to asthma triggers

By: 6/30/05

Establish a comprehensive plan to reduce the burden of asthma in four sets of age groups of children: reduce encumbrance of asthma for children; and develop a comprehensive asthma surveillance system for each of the four age groups.

By: 6/30/05

Develop educational material regarding environmental triggers of asthma and distribute to childcare facilities and other interested parties.

By: 6/30/05

Clean Sweeps PPG (Y/N): Y EPA Role: Grant funding.

Conduct a third round of laboratory chemical clean-outs ("Clean Sweeps") at selected schools across Indiana. Thirty (30) of the 400+ schools participating in the Mercury Recycling Pledge Program will be selected to have the "Clean Sweep" services provided at no cost to the school. All schools participating in the pledge program will be encouraged to apply for these services.

1) Finalize scope of work and submit Request for Information to potential contractors.

```
By: 1/1/04
```

2) Select schools and ask for a commitment letter.

```
By: 5/31/04
```

4) Select contractor to remove unused and expired chemicals and properly dispose of them.

```
By: 5/31/04
```

5) Organize and coordinate schedule with contractor and respective schools.

```
By: 5/31/04
```

5) Conduct Clean Sweeps.

```
From: 6/1/04 – 8/31/04
```

6) Prepare and submit final report to EPA, which will include a break down of the types of chemicals removed including specific EPA waste minimization priority chemicals.

```
By: 10/31/04
```

```
Diesel Emissions Reduction PPG (Y/N): N
```

Work to create a statewide volunteer "No idle at schools" policy for school buses.

```
By: 6/30/04
```

Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

```
By: 6/30/04
```

Develop and distribute marketing materials for this volunteer program.

```
By: 6/30/05
```

Work with the Office of Air Quality to investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

```
By: 6/30/05
```

Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

```
By: 6/30/05
```



Continue to partner with the U.S. Environmental Protection Agency to market asthma education and actively promote the Tools for Schools curriculum in schools / school districts.

Ongoing through 6/30/05

Indoor Air Quality Curriculum

PPG (Y/N): N

EPA Role: EPA produces the Tools for Schools kit, which promotes indoor air quality. This curriculum's approach will be similar to Tools for Schools - but will be Indiana-specific and will focus on teachers. EPA will be reviewing the curriculum.

Print Indiana's Indoor Air Quality curriculum materials and place them on IDEM's website.

By: 6/30/04

The Environmental Education Team will conduct outreach to schools to promote and implement Indiana's Indoor Air Quality curriculum.

By: 6/30/05

Lead PPG (Y/N): N

EPA Role: Grant funding. Provide oversight of grant to Office of Air Quality.

Mini grants:

Award and manage 10 mini grants to local health departments and Community Action Agencies to address compliance assistance for Indiana lead contractors, lead licensed personnel and individuals/organizations.

By: 9/30/03

Enviro-School Program:

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

By: 6/30/05

Risk Advisory Committee

PPG (Y/N): N

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Ongoing through 6/30/05

Lead by OPA, IDEM program offices, OAQ, OLQ, OWQ and OPPTA, will work to:

1)	dentify specific chemicals, contaminants, areas and categories for the priority
pollutan	toxic list.

By: 12/31/03

2) Develop a process to make better risk-based decisions and allocation of resources.

By: 6/30/04

3) Assist other IDEM offices in addressing their priority contaminants.

By: 6/30/05

4) Participate in agency-wide meetings.

Ongoing through 6/30/05

Agency Central Facility Data System

PPG (Y/N): N

EPA Role: Continue to fund the National Environmental Information Exchange Network (NEIEN). Continue to provide policies, standards, procedures, and guidance for data management practices.

Working with IDEM's Office of Management and Budget Administration's (OMBA) Information Technology section, develop and implement Indiana Facility Registry System (IFRS) plan to streamline data exchange between IDEM and EPA and promote quality environmental data.

By: 7/31/05

Mercury Issues

PPG (Y/N): N

Mercury is a priority chemical based on concern over human exposure, available data, multimedia issues and a focus to reduce the release of mercury into the environment, especially where kids are present.

Mercury workgroup

PPG (Y/N): N

IDEM has assembled a mercury workgroup to address mercury concerns. Mercury is a priority chemical based on concern over human exposure, available data, multi-media issues and a focus to reduce the release of mercury into the environment - especially where kids are present.

As an agency, IDEM will focus on:

Implementing recommendations for next steps to reduce mercury emissions.

Through: 6/30/05

Developing overall multi-media mercury reduction plan, identifying the various mercury "loads".

By: 6/30/05

Mercury data management

PPG (Y/N): N

Gather and analyze mercury data to provide key information to guide IDEM's mercury water quality planning efforts, a part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, and fish tissue sampling data.

Chart USGS data and Cross-reference USGS data with IDEM data.

By: 9/30/04

- List Mercury (Hg) reduction actions/projects IDEM has already taken.

By: 10/31/03

- Get latest (2000) rapids (EPA) data and analyze it to compare with 1997 and 1999 rapids data (this data is released biennially).

By: 10/31/03

Assess impact of more stringent federal rules on medical waste incinerators.

By: 12/31/03

- Gather available data on reported Hg discharges from Indiana publicly owned treatment works (POTWs).

By: 6/30/05

- In conjunction with the wastewater triennial review, determine, as fully as possible, the various sources of Hg in the influent of POTWs.

By: 12/31/04

Mercury Exposure and Education

PPG (Y/N): N

Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

Ongoing

Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Through: 6/30/05

Mercury & Schools PPG (Y/N): N

Lead the school mercury reduction and recycling pledge program. Conduct outreach campaign and offer assistance to schools, SWMDs, and the City of Indianapolis where needed.

Through: 6/30/05

Auto Salvage PPG (Y/N): N

EPA Role: Major funding source. Funded under OECA grant. Grant runs from 8/1/00 to 9/1/04.

Grant runs from Aug. 1, 2000 – September 1, 2004. Deliverables include a compliance assistance manual, compliance assistance workshops, inspections, enforcement actions and a final report.

Coordinate and help implement auto salvage agency-wide focus.

Ongoing through 8/1/04

Coordinate workgroup to implement program.

Ongoing through 9/1/04

Continue to serve as agency contact for auto salvage grant and turn in quarterly reports. Upon completion of the project, compile a final report.

By: 10/03, 1/04, 4/04, and 7/04 for quarterly reports Final report by 8/04

Work with IDEM's Office of Land Quality, Office of Water Quality and Office of Enforcement, other State and Federal agencies, and auto salvage project inspectors, to coordinate inspections, oversee compliance referrals and establish remediation guidelines.

Ongoing through 9/1/04

Conduct compliance assistance workshops throughout the state.

By: 7/31/03

Submit Clean Water Act 104(b)(3) grant proposed for a series of three posters, key chains and magnets. Administer program if grant application is approved.

By: 3/31/03

EnPPA PPG (Y/N): N

EPA Role: Provide oversight and grant funding. Finalize 2003-2005 EnPPA.

By: 7/1/03

Strategic Planning PPG (Y/N): N

Develop/refine a new strategic plan for IDEM to guide future agency initiatives.

By: 6/30/04

IDEM's Quality Management Plan

PPG (Y/N): N

To coordinate and implement management and technical quality assurance and quality control policies and procedures throughout the agency as described by the agency Quality Management Plan.

Due Date / Through: 6/30/05

Management of IDEM's Quality-Related Documents
(SOPs, COPs, QAPPs)

PPG (Y/N): N

* Begin to track quarterly all Program/Office Quality Assurance Project Plans by implementing the recently developed QAPP tracking database.

By: 1/31/04, and then Ongoing 6/30/05

* Develop and maintain an agency-wide listing of Standard/Current Operating Procedures (SOPs and/or COPs) to include the effective dates of such documents, as well as the SOP review schedule.

By: 1/31/04, and then Ongoing 6/30/05

* Assess and update the listings of program office QMP related files, which appear as addenda to the QMP and describe each program office's files and documents that are pertinent to the implementation of an agency Quality System (e.g., relevant rules, regulations, statutes and laws; technical and guidance documents; non-rule policy documents; etc.).

By: 6/30/05

* IDEM QA Manager to actively work with agency offices to identify quality assurance/quality control related documents and/or new grants, contracts or programs that must be referenced in the agency Quality Management Plan.

Ongoing to 6/30/05

Quality Assurance Assessment of IDEM's Quality System and Quality Management Plan EPA Role: *EPA will provide guidance to IDEM on the use of quality assessment tools to evaluate the effectiveness of the IDEM Quality System. *EPA to provide guidance on the procedures used for the Region's review of their own Quality System and QMP. *EPA Region 5 will monitor and assess IDEM's Quality System and Quality Management Plan.

- * Expand the composition of the current IDEM QA Team to include program office managers and other QA/QC staff.
- * The IDEM Q/A Manager will also maintain contact monthly with at least one already developed team or workgroup within IDEM that concentrates on big-picture, cross-media Program Office work/issues (E.G. Compliance/Enforcement Team, Data Management Team, Public Records Managers, RCRA Advisory Group, IDEM QA Team; etc.)

Ongoing.	

* Hold quality assurance meetings, at least quarterly, with the Quality Assurance Team (QA Team), program and project managers from all program offices and other quality assurance/quality control (QA/QC) staff within the program offices. The purpose of the meetings is to develop implementation and assessment phase policies and procedures for ensuring consistency of QA procedures across all IDEM program.

Through: 6/30/05

* Once the processes and procedures for the implementation and assessment phases are developed, the IDEM QA Manager will work with all IDEM offices to ensure consistency of QA procedures across all programs.

Ongoing through 6/30/05

* Begin planning for assessments and/or reviews of specific office programs and projects. It will also be necessary to determine the order in which IDEM offices will be assessed/reviewed. Develop a timeline and plan for implementation.

By: 6/30/05

*Assess the adequacy of the IDEM Quality System at least annually, including a review of the QMP, which will be revised or updated as required. Also, provide a report of the QMP review findings to IDEM Management and EPA Region 5.

By: 6/30/04 and 6/30/05

QMP/Quality System Related Training

PPG (Y/N): N

EPA Role:

- * EPA Region 5 Quality Assurance team to organize and/or provide quality assurance training opportunities to IDEM staff (in-house when possible).
- * EPA Region 5 to provide training, assistance, and guidance on the applicability of EPA Information Quality Guidelines to state environmental programs and the data/information submitted to EPA
- * EPA to also provide environmental science-related informational opportunities to IDEM staff via the Region 5 State Science Council.
- * Training opportunities for the IDEM QA manager and other QA/QC staff will be identified and provided.
- * IDEM QA Manager will attend one training opportunity per year, if available, timely, and cost effective; and disseminate any relevant information to IDEM staff.

BY: 6/30/04 and 6/30/05

* Coordinate with IDEM Human Resource Training Director to introduce new staff to the IDEM Quality System culture and QMP via new employee orientation classes.

Ongoing through 6/30/05

Communicating IDEM Quality-Related Information with PPG (Y/N): N

EPA Role:

- * EPA Region 5 will provide the IDEM Quality Assurance Manager with any relevant information about quality related issues.
- * EPA Region 5 Science Council to provide information for implementing 'best science practices' and other techniques for ensuring that quality data is used for decision making.
- * EPA Region 5 Science Council to act as conduit to EPA Office of Research and Development (ORD) for future research projects that might benefit IDEM's environmental efforts.
- * EPA Region 5 Science Council to provide guidance on peer review policy and procedures to achieve/ensure 'better science' within states, regions, and the nation.
- *Maintain contact with EPA Region 5 Quality Assurance Team at least one time per quarter and maintain consistent progress toward disseminating quality assurance related information.

Through: 6/30/05

* IDEM QA Manager to serve as primary IDEM contact for EPA Region 5 Science Council and to coordinate the dissemination of science council information throughout the agency.

Through: 6/30/05	

* Develop an IDEM Peer Review Panel that will be established to review and approve study plans and reports for major special studies and other technical documents for publication and distribution.

Through: 6/30/05

2.2.13. Office of Pollution Prevention and Technical Assistance

It is the goal of the Office of Pollution Prevention and Technical Assistance (OPPTA) to develop and foster within the Indiana Department of Environmental Management's environmental protection efforts an emphasis on environmentally and economically sound approaches to achieve environmental results. This includes proactively providing resources for source reduction, re-use and recycling, voluntary compliance and pollution prevention. OPPTA encourages environmental results through various

Office Contact(s):

Jim Mahern Assistant Commissioner Office of Pollution Prevention and Technical Assistance (317) 233-6658 e-mail: jmahern@dem.state.in.us

grant opportunities, public recognition awards such as the various "Governor's Awards for Excellence," broad-based educational programs and technical assistance.

2.2.13.1. Agency Priorities

Building a Better IDEM – Centralized Web Development

Lead Office: MACS/OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to MACS.

Share information on office publications for use in the on-line publication catalog/archive.

Building a Better IDEM - Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

The Office Data Contact (ODC) will actively participate in data management team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. ODC will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance.

Ongoing through 6/30/05

Building a Better IDEM – Address Quality Issues – Quality Management Plan

Lead Office: OPA

Actively participate in the Region 5 State Science Council efforts as well as the IDEM 'peer review' panel development and implementation processes.

Ongoing through 6/30/05

Coalition Building – Build on Environmental Education Efforts

Lead Office: OPA

EPA Role: Funding, guidance

Recycling education: Continue educating students, teachers, consumers, public officials and businesses about the benefits of recycling and related source reduction activities through presentations, publications, guidance documents and technical assistance programs.

By: 6/30/03

Illegal burning: Conducting an illegal burning workshop for public officials in partnership with groups like Southern Indiana Recycling Initiative (SIRI), Northern Indiana Recycling Initiatives (NIRI), Association of Indiana's Solid Waste Management Districts (AISWMD), Indiana Association of Cities and Towns (IACT), to

By: 6/30/05

Coalition Building - Partnering with Universities on Research and Technical Issues

Lead Office: OPPTA

Establish Industrial Pollution Prevention Internships

Work with Human Resources to consider the development of an internship program with OPPTA/CMTI. Work with Clean Manufacturing Technology Institute (CMTI) to evaluate the possibility of a college pollution prevention internship program. This program would allow engineering students to assess participating facilities for pollution prevention opportunities.

By: 6/30/04

Maintain Essential Environmental Services - Coordinate C/E and Compliance and Technical Assistance Program (CTAP) Programs

Lead Office: OPPTA

Develop mechanism through C/E Team to advise Compliance and Technical Assistance Program (CTAP) program on areas of regulatory compliance that are consistently not adhered to and/or areas of upcoming regulations that will impact small businesses.

By: 9/1/03

Utilize Compliance and Technical Assistance Program (CTAP) resources in developing compliance assistance tools and providing outreach on new regulations or problem areas for small businesses.

By: 7/1/05

Develop referral process to Compliance and Technical Assistance Program (CTAP) for small businesses recently inspected with findings of deficiencies that Compliance and Technical Assistance Program (CTAP) staff can assist with coming back into compliance.

By: 7/1/05

Maintain Essential Environmental Services - Enhance and coordinate IDEM's assistance to small-regulated entities through the Compliance and Enforcement Team.

Lead Office: OPPTA The compliance/enforcement team provides a centralized mechanism for a coordinated effort to define, implement and allocate assistance resources (i.e. financial, compliance, technical, regulatory development and regulatory outreach) for small business and other small regulated entities. The Compliance and Enforcement Team's attention to these various media efforts will lead to a more efficient use of existing resources in implementing priority assistance efforts.

Maintain Essential Environmental Services and Deliver Services in an Efficient Manner as Practical

Develop a plan to encourage Toxic Release Inventory Reporters to utilize electronic reporting with the TRI-ME software. Research current number of hard copy reports submitted.

By: 12/31/03

Implement plan

By: 1/31/04

Measure effectiveness.

By: 7/1/05

Prioritize Services and Programs

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Risk Advisory Committee

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Ongoing through 6/30/05

Lead by OPA, IDEM program offices, OAQ, OLQ, OWQ and OPPTA, will work to:

Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list

By: 12/30/03

Lead Office: OPA

_	
Deve	elop a process to make better risk-based decisions and allocation of resources
	By: 6/30/04
Assis	st other IDEM offices in addressing their priority contaminants
	By: 6/30/05
Partio	cipate in agency-wide meetings
	through 6/30/05
Reducin	g Key Environmental Threats – Enviro-School Program Lead Office: OPA
E	EPA Role: Provide funding and guidance.
Scho	ner with EPA, Indiana State Department of Health, Indiana Department of Education, State ol Board Association, Indiana-Purdue University to develop the Environmental Management em (EMS) or the Enviro-School program that would ensure a healthy school environment for ren.
	Due Date / Through: 6/30/05
2.2.13.2.	Office Priorities
2	003 Governors Award for Environmental Excellence
(1)	Award recipients are notified.
	By: 8 15/03
(2)	Program content is finalized and publications are developed.
	By: 8 15/03
(3)	Awards are presented at the Governor's Conference on the Environment.
	By: 9/19/03
20	004 Governors Award for Environmental Excellence
(1)	Finalize nomination form.
	By: 12/31/03
(2) with t	Put nomination form on website, mail out postcard announcing the program and work the Office of Media and Communications (MACs) on a press release.
	By: 1/31/04
(3)	Review committees are finalized and meeting times scheduled.
	By: 3/12/04
(4)	Review committees meet and review nominations.

By: 5/21/04

(5) Site visits are performed.

By: 6/25/04

(6) Compliance reviews are complete.

By: 5/21/04

(7) Award recipients are notified.

By: 8/15/04

2.2.13.3. OPPTA - Branch Specific Priorities

2.2.13.3.1. Pollution Prevention Branch

The Pollution Prevention (P2) Branch provides an active outreach program which promotes pollution prevention to Indiana industry and within the Indiana Department of Environmental Management (IDEM). These efforts include public education and technical assistance through site visits, fact sheets, workshops, P2 integration, P2 partnerships with Indiana businesses, and recognition programs such as the Governor's Toxic Reduction Challenge. The P2 Branch also manages the state's Toxic Release Inventory (TRI) program.

Assist the divisions of air, water and land in identifying, within planned and existing regulatory programs, obstacles to pollution prevention and opportunities to promote and assist in pollution prevention.

PPG (Y/N): N

EPA Role: Coordination with EPA on SEP and pollution prevention integration projects.

(1) Develop and implement a plan to review all first rule notices for the Indiana Department of Environmental Management (IDEM) for pollution prevention opportunities. Plan will include a system for forwarding rules with potential pollution prevention opportunities to the Partners for Pollution Prevention (P4P2) for consideration to comment.

By: 7/1/04

- (a) The Office of Pollution Prevention and Technical Assistance (OPPTA) will attend internal agency rule planning meetings.
- (b) OPPTA will work with other IDEM offices to identify rules that provide Pollution Prevention (P2) opportunities.
- (c) OPPTA will attend the initial rule meetings prior to publication of a 1st notice.
- (d) OPPTA in cooperation with appropriate offices will review each of the rule projects to decide which rules provide P2 opportunities based on criteria such as: the number of industries impacted by the rule; the amount of emissions involved; and knowledge of P2 opportunities.
- (2) Respond to requests from the Office of Enforcement (OE) for technical assistance on the determination of pollution prevention Supplemental Environmental Projects (SEPs) with in seven working days. Work with the Environmental Protection Agency (EPA) to obtain examples of past SEPs.

Work with existing environmental regulatory programs to make use of existing information-gathering systems that may assist the division in assessing the progress of pollution prevention statewide. (IC 13-27-2-5)

PPG (Y/N): N

EPA Role: Analyze Toxic Release Inventory data for pollution prevention, assistance and compliance/enforcement strategy for major Toxic Release Inventory increases; prioritize Toxic Release Inventory reported substances for future regulatory and non-regulatory consideration.

(1) Promote accurate voluntary reporting of Source Reduction Activity (SRA) Code reporting to Toxic Release Inventory (TRI) through increased educational efforts during TRI workshops and on the TRI website. This data may be useful in analyzing pollution prevention efforts throughout the state.

By: 6/30/04

(2) Log TRI Form R's received and enter the information into the database.

By: 8/15 of each year for forms postmarked by July 1

(3) File all Form R's in appropriate locations with the TRI file room.

By: 8/30 of each year for forms postmarked by July 1

(4) Quality assure and effectively communicate Toxic Release Inventory (TRI) data.

By: May 31 of each year

(5) Release data through a formal Indiana Department of Environmental Management (IDEM) press release, in "Indiana's Annual State of the Environment Report" and the IDEM TRI web site on the Internet.

By: June 30 of each year

(6) Maintain Indiana searchable TRI website.

By: Ongoing

(7) Provide TRI data upon request to internal and external customers.

By: Ongoing

(8) When possible, work with program offices to develop a mechanism to address sectors with large impact on TRI if other voluntary pollution prevention efforts fail.

By: Ongoing

(a) Utilize TRI release data to identify the top 20 to 50 TRI reporters having the most significant impact on state TRI air and water release totals:

Identify the top 100 TRI release reporters and from there remove:

Facilities that are impacted by a significant regulatory driver within the next year (i.e., June 2004).

Facilities that are included in the new TRI reporting sectors starting in RY 1998.

	By: June 30 of each year
(b)	Utilize TRI release data to identify the top ten most significant chemicals reported to TRI.
	Identify facilities associated with the releases of the top ten chemicals.
	By: June 30 of each year
(c)	Make available the TRI reporters' data to all agency programs.
	By: June 30 of each year
(d)	Communicate data on persistent, bioaccumulative toxic substance reported to TRI.
	By: June 30 of each year
	Work with Indiana Department of Environmental Management (IDEM) Information ology to convert the existing Toxic Release Inventory (TRI) database into an agency yed platform.
(a)	Scope of work for conversion completed.
	By: 6/1/03
(b)	Project proposal to be presented to Data Management Team (DMT)
	By: 7/1/03
(c)	RY 2001 data converted to new platform.
	By: 12/31/03
(d)	Remaining reporting years data, including RY 2002, converted to new platform.
	By: 3/1/04
(e)	Beta test of Toxic Release Inventory database
	By: 4/1/04
(f)	Implementation phase or full scale testing
	Beginning: 5/31/04
(g)	Production rollout
	By: 6/1/04
(h) assura	Begin to use the newly developed TRI database system for data entry and quality unce of the RY 2003 data to be received.
	By: 7/1/04
(i)	Final review phase completed
	By: 8/1/04
(10) Record	Prepare all TRI reports from 1995 – 1998 and send them to the Commission on Public ds for microfilming

By: 7/1/04

- (11) Participate in the Data Management Team (DMT).
- (a) Attend DMT meetings.

By: Quarterly — at a minimum

(b) Review and comment on documentation guiding and supporting the Agency Data Integration priority.

Ongoing

(c) Review and comment on project proposals for offices moving databases into Oracle and other Indiana Department of Environmental Management (IDEM) approved platforms.

Ongoing

(12) Participate in Agency GIS (Geographic Information Systems) Workgroup. Serving in an advisory capacity, review and comment on policies and procedures.

Ongoing

2.2.13.3.2. Source Reduction and Recycling Branch

The Source Reduction and Recycling Branch is charged by statute to provide financial and technical assistance to local communities to provide education and promotion of recycling collection, the use of recycled materials, solid waste source reduction, management of yard waste, and household hazardous waste collection. It is our goal to assist local governments in achieving the statutory goal of 50% waste reduction through outreach efforts that consist of providing grants to cities, towns, counties, schools, non-profits, and local solid waste management districts. We also provide public education and technical assistance through site visits, recognition programs, assistance brochures, fact sheets and training workshops.

Evaluate national recycling/diversion methodology to compare national strategy to the state of Indiana strategy

EPA Role: Coordinate with US EPA regarding potential programmatic and regulatory models in other state that have implemented the EPA model.

- (1) Identify Indiana hurdles to implementing the national recycling/diversion calculations.
- (a) Produce a document outlining the comparisons.

By: 6/30/04

(b) Implement the national recycling/diversion calculations, if data is available and senior staff determines it to be a priority.

2.2.13.3.3. Compliance Assistance Branch

The Office of Voluntary Compliance (OVC) is the Indiana small business assistance program. We assist regulated entities in achieving compliance and promoting cooperation between the Indiana Department of Environmental Management and regulated entities. Outreach efforts consist of providing assistance to inquiries; developing compliance manuals, developing recognition programs, assistance brochures, fact sheets and conducting educational workshops.

To effectively provide the type of assistance that may be required by the regulated community, the Office of Voluntary Compliance employees maintain a strict confidentiality policy.

Measuring compliance assistance activities:

Office of Voluntary Compliance (OVC) administers the Compliance and Technical Assistance Program (Compliance and Technical Assistance Program (CTAP)). OPPTA Compliance and Technical Assistance Program (CTAP) constructed a database, customer satisfaction survey and site visit survey to quantitatively measure results with regard to Compliance and Technical Assistance Program activities. Information gleaned from the database is screened to remove confidential information, as required per IC 13-28-3-4.

Compliance and Technical Assistance Program activities are measured with the following three tools:

1. Database

The database contains information on all Compliance and Technical Assistance Program activities. Standard Compliance and Technical Assistance Program activities include phone assistance, on-site assistance and workshops/presentations.

2. Customer Satisfaction Survey

The customer satisfaction survey (available at http://www.in.gov/idem/oppta/survey.html), measures how effectively Compliance and Technical Assistance Program (CTAP) provides customer service. Surveys submitted are entered into the Compliance and Technical Assistance Program (CTAP) database. A summary report is produced to track overall customer satisfaction.

3. Site visit survey

The site visit survey (available at http://www.in.gov/idem/ctap/survey) measures the economic and environmental (compliance) impact of Compliance and Technical Assistance Program (CTAP) compliance and/or pollution prevention site visits. Submitted surveys are entered into the Compliance and Technical Assistance Program (CTAP) database, where a summary report is produced.

Compliance Assistance: Continue Office of Voluntary Compliance (OVC)/Compliance and Technical Assistance Program (Compliance and Technical Assistance Program (CTAP)) to assist regulated entities in achieving regulatory compliance and promote cooperation between the department and regulated entities. (IC 13-28-1-2)

PPG? (Y/N):

- (1) Provide high quality compliance assistance to all callers who are referred to the Office of Pollution Prevention and Technical Assistance (OPPTA) phone assistance team to increase the number of true confidential assistance calls.
- (a) Redistribute and/or evaluate the phone assistance team routing form annually.

By: 8/31/03 and 8/31/04

- (b) Continue totaling calls and site visits from Compliance and Technical Assistance Program (CTAP) database every two weeks and report in OVC Bi-weekly.
- (c) Monitor employee use and evaluate responses in Compliance and Technical Assistance Program (CTAP) database through monthly report runs.

(d) Review and edit Compliance and Technical Assistance Program (CTAP) database Current Operating Procedures and instructions for using the Compliance and Technical Assistance Program (CTAP) database.

By: 9/30/03 and 9/30/04

Continue to work with U.S. EPA on implementing the National Performance Track Program.

PPG? Y/N): N

EPA Role: Set up site visits and work with IDEM on securing potential funding and necessary resources to implement regulatory benefits to Indiana Performance Track members

- (1) Continue working with the Compliance Enforcement Team in reviewing compliance performance by Indiana applicants to the program.
- (2) Submit recommendations as to whether each applicant merits entrance into the program based on compliance history.

By: 12/31/03; 6/30/04; 12/31/04 and 6/30/05

- (3) Coordinate with the Environmental Protection Agency (EPA) on performing site visits relating to the facilities Environmental Management System.
- (4) Working with Senior Staff and the Compliance Enforcement Team, consider the regulatory flexibility and the "no routine" compliance inspections ideas from EPA and implement if feasible and desirable.

2.2.14. Southwest Regional Office

The Southwest Regional Office serves the counties of Crawford, Daviess, Dubois, Gibson, Knox, Martin, Orange, Perry, Pike, Posey, Spencer, Vanderburgh, and Warrick in southwest Indiana by providing a local access to permits, inspection reports and general information on environmental activities with State, municipal, and industrial facilities. In addition,

Office Contact(s):

Judy Dicus Thomann Director Southwest Regional Office (812) 436-2584 e-mail: jthomann@dem.state.in.us

staff of the Southwest Regional Office answer questions from the public on a wide range of environmental subjects and represents the environmental community at important gatherings.

2.2.14.1. Office Priorities

Complete Southwest Regional Office portion of the Office of Air Quality's Air Compliance Section goals.

PPG? Y/N): N

Conduct a total of 160 major air source commitment compliance inspections including Title V; FESOP and NESHAP. (Gene & Scott)

By: 6/30/05

Investigate 100% of air complaints in the Southwest Region. (Gene & Scott)

By: 6/30/05

Complete Southwest Regional Office portion of the Office of Air Quality's Asbestos Section Compliance goals.

PPG? Y/N): N

Inspect a minimum of 80% of all asbestos notifications received (directly or via the Indianapolis Office) in the Southwest Region.

By: 6/30/05

Administer third part lead examinations for all Lead Inspector, Risk Assessor, and Supervisor applicants in the Southwest Region.

By: 6/30/05

Investigate 100% of all asbestos complaints no later than the next working day.

By: 6/30/05

Complete Southwest Regional Office portion of the Office of Land Quality's Agriculture and Solid Waste Compliance Section goals.

PPG? Y/N): N

Inspect 100% of Regional Solid Waste facilities according to OLQ program scheduled intervals, including: Landfills, Transfer Stations, Restricted Waste Sites, Construction/Demolition Sites, and permitted incinerators.

By: 6/30/05

SWRO will conduct comprehensive inspections of 20% of confined feeding operations within the Southwest Region's thirteen counties each fiscal year.

By: 6/30/04 and 6/30/05

Conduct construction inspections at 100% of all CFO construction sites based on the start of construction notification during each fiscal year.

By: 6/30/05

Inspect 100% of 26 Regional septage hailers encompassing 55 Regional Septage Trucks annually.

By: 6/30/05

Inspect 100% of regional permitted land application sites annually.

By: 6/30/05

Investigate 100% of solid/agricultural waste complaints concerning the Southwest Region, during the fiscal year.

By: 6/30/05

Complete Southwest Regional Office portion of the Office of Land Quality's Underground Storage Tanks Compliance Section goals.

PPG? Y/N): N

Inspect 100% of the registered Underground Storage Tank (UST) s annually.

By: June 30 2005

Investigate 100% of UST complaints concerning the Southwest Region, during the fiscal year.

By: June 30 2005

Provide 24-hour a day response capability within the Southwest Region to ensure that responsible parties report and clean up spills, and ensure a 100% field response at Priority 1 releases.

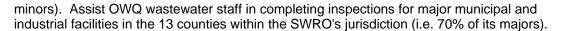
PPG? Y/N): N

By: 6/30/05

Complete Southwest Regional Office portion of the Office of Water Quality's Wastewater Section's compliance goals

PPG? Y/N): N

Complete Southwest Regional Office portion of the Office of Water Quality's wastewater inspection commitments for minor municipal and industrial permitted facilities (i.e., 30% of its



By: 6/30/04 and 6/30/05

Assist Indianapolis Compliance Staff (as needed) to inspect Major, Community National Pollutant Discharge Elimination System (NPDES) facilities in the Southwest Region.

Ongoing

Investigate 100% of wastewater complaints concerning the Southwest Region.

Ongoing

Complete Southwest Regional Office portion of the Office of Water Quality's Drinking Water Section's compliance goals

PPG? Y/N): N

Inspect 100% of the assigned Community Public Water Systems listed by the SDWIS system in the 21 southern assigned counties. (Community systems inspections every 3 - 5 years.)

By: 9/30/05

Conduct 200 site visits of community, transient and non-transient water systems in the 21 southern assigned counties.

By: 9/30/05

Investigate 100% of drinking water complaints concerning the 21 southern assigned counties.

By: 9/30/05

Complete Southwest Regional Office portion of the Office Pollution Prevention and Technical Assistance Section's goals.

PPG? Y/N): N

Provide assistance to businesses that seek information on pollution prevention opportunities for their manufacturing or commercial facilities by providing technical information (IC-13-27-2-5).

By: 9/30/05

Provide quality assistance regarding Pollution Prevention to at least 200 callers who are referred to the OPPTA phone assistance.

By: 9/30/05

Provide pollution prevention assistance to our customers upon request.

By: 9/30/05

2.2.15. Office of Water Quality

INTRODUCTION:

The quality of Indiana's surface water and drinking water has vastly improved in the past few decades. However, on the 2002 303(d) list Indiana has 428 documented impaired waterbodies and some streams have yet to be adequately characterized. Indiana still has some drinking water providers that

Office Contact

Tim Method Deputy Commissioner Office of Water Quality (317) 233-1210

e-mail: tmethod@dem.state.in.us

do not provide safe water 100% of the time. Also, Indiana has lost about 85% of the valuable wetlands that serve to enhance water quality.

2.2.15.1. Agency Priorities

Building a Better IDEM - Centralized Web Development

Lead Office: MACS/ OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to MACS.

Share information on office publications for use in the on-line publication catalog/archive.

Building a Better IDEM – Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

The Office Data Contact (ODC) will actively participate in data management team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. ODC will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance

Ongoing through 6/30/05

Building a Better IDEM – Establish Facility Registry System (I-FRS)

Lead Office: OPA/OMBA-BSD

Map drinking Water database to I-FRS.

Ongoing through 6/30/05

Building a Better IDEM – Geography Network

Lead Office: OMBA-BSD

Participate in GIS data inventory and in drafting and implementing a metadata development plan.

By: 10/01/03

Building a Better IDEM – Address Quality Issues – Quality Management Plan

Lead Office: OPA

Actively participate in the Region 5 State Science Council efforts as well as the IDEM 'peer review' panel development and implementation processes.

Ongoing through 6/30/05

Building a Better IDEM - Records Management

Lead Office: OLC

Ensure records currently considered public and to be disclosed upon request do not enhance opportunities for terrorist strikes.

Ongoing

Maintain Essential Environmental Services – Agency-Wide Permit Team

Lead Office: Deputy Commissioner / OPA

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Ongoing through 6/30/05

Maintain Essential Environmental Services – Internet Public Notice Standardization

Lead Office: OPA

Participate in workgroup. Assist OPA in the standardization of public notice information posted via the Internet

Ongoing through 6/30/05

Maintain Essential Environmental Services - Compliance / Enforcement Team

Lead Office: OE

Routinely participate in CE Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Maintain Essential Environmental Services - Stormwater Enforcement Strategy

Lead Office: OWQ

Develop a strategy for enforcing stormwater phase II requirements.

By: 9/30/04



Lead Office: OWQ

As part of its goal to keep Hoosiers from harm, IDEM will address issues of homeland security by:

Filling a newly created position dedicated to drinking water security and infrastructure protection.

The OWQ Security coordinator will work in concert with key staff in OLQ and OAQ, as needed, to ensure that the agency participates effectively in the state's counter-terrorism efforts.

Ongoing through 6/30/05

Coordinate IDEM's interactions with other federal, State and local agencies on matters relating to security and infrastructure protection.

Ongoing through 6/30/05

Be the point of contact for matters relating to infrastructure security.

Ongoing through 6/30/05

Reduce Key Environmental Threats - Coordinating with SEMA to develop and implement emergency response plans

Lead Office: OLQ

Work with OLQ and SEMA to develop a drinking water system response protocol that will be incorporated into Indiana's Statewide Comprehensive Emergency Management Plan. The response protocol will be designed to address two important aspects of emergency planning and response. First, the protocol will address how specifically the State will respond to an incident. real or threatened, at a public water system. The second portion of the protocol will deal with the decision making process for determining what to communicate to the public and what steps to take regarding the safety and use of the drinking water based on the findings of the initial investigation.

By 1/1/04

Reduce Key Environmental Threats - Training drinking water staff, waste water staff, emergency response staff and SEMA staff in performing vulnerability assessments and emergency response planning.

Lead Office: OWO

Vulnerability assessments and emergency response planning:

Provide assistance to community systems serving over 3,300 population in meeting federal requirements. Report number of systems assisted quarterly.

Ongoing through 6/30/05

Provide assistance to community systems serving less than 3,300 population and non-community systems. Report number of systems assisted quarterly.

Ongoing through 6/30/05

Reduce Key Environmental Threats – Reduce the potential for bioterrorism and ensure that there is an effective response should an incident occur.

Lead Office: OWQ

Working with existing programs such as wastewater, hazardous waste, confined feeding and drinking water to develop strategies to protect existing facilities, reduce the potential for bioterrorism and ensure that there is an effective response should an incident occur.

Ongoing through 6/30/05

Prioritize Services & Programs - Address Most Significant Water Quality Issues

EPA Role: Conduct an initial review and then periodically review to ensure that all areas of the Office are focused on highest, best use of staff time and resources to gain water quality improvements and most critical services to citizens.

Focus Internal Resources to Address Most Significant Water Quality Issues

Ensure that OWQ Priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting the water quality across the state.

Conduct a semi-annual review of OWQ activities to ensure that all work continues to be prioritized to provide efficient/effective services and is oriented toward making a significant difference in water quality improvement and protection. The review will include, at a minimum, a presentation by each branch chief on current activities and any planned changes to those activities to the OWQ senior management team. Adjustments as necessary will be made by the team.

By: 7/1/03 and biannually thereafter

2.2.15.2. Office Priorities

Progress On Restoring Impaired Waterways

PPG (Y/N): Y

IDEM Office of Water Quality will continue to improve coordination of the various efforts aimed at removing impairments to Indiana's waterways. Staff and funding resources aimed at identifying impairments and targeting efforts to reduce contributions to impairments are limited. Our focus will be to best leverage and prioritize all of our resources and current programs, with those of local watershed groups, community efforts, and other state and federal agencies (e.g., DNR, EPA and NRCS) to make measurable, rapid progress in improving the water quality of impaired water bodies. OWQ programs include Total Maximum Daily Load (TMDL), 305b/303d listings, watershed planning and implementation, water quality standards, wetlands, state revolving loan funds, National Pollutant Discharge Elimination System (NPDES), and water quality assessment

and coordination with point source and groundwater and land cleanup programs. Tools will include organizational change, cross-functional teams, increased outreach and focused targeting of grant and loan funding and staff efforts. OWQ will also increase the use of external advisory groups to help shape water quality priorities and policies.

- 1. Realign existing agency staff as needed to more effectively use our human resources to accomplish an integrated watershed management approach.
 - a. Identify the best alignment of resources needed to accomplish an integrated watershed management approach

By: 7/31/03

This includes evaluating OWQ staff skills and programs for TMDL, 305b/303d listings, watershed planning and implementation, water quality standards, and water quality assessment.

b. Based on the resource evaluation, develop and implement a strategy to reassign OWQ programs and/or staff to the OWQ branches and sections determined to be most appropriate for accomplishing an integrated watershed management approach.

By: 9/30/03

- 2. Use existing qualitative and quantitative information and tools to best describe where we are now in terms of impairment and efforts to reduce impairments and work towards an integrated watershed management approach.
 - a. Evaluate and identify what resources are needed and what resources are available to utilize GIS tools to integrate pertinent information for water bodies, e.g., known point sources, potential sources of contamination, grant projects, active watershed groups, monitoring data, etc.

By: 12/31/03

b. Develop a work plan to define actions needed to utilize GIS tools to integrate pertinent information for water bodies

By: 3/31/04

c. Implement work plan (as resources are available) to utilize GIS tools to integrate pertinent information for water bodies

By: 6/30/05

3. Coordinate OWQ's TMDL, water quality assessment, and watershed planning and implementation programs such that they work together towards an integrated watershed management approach.

EPA Role: Provide technical assistance as necessary and appropriate, on developing TMDL wasteload allocations for National Pollutant Discharge Elimination System (NPDES) stormwater sources and developing effluent limits consistent with those wasteload allocations.

a. Develop coordination protocol to establish internal links between OWQ's TMDL, water quality assessment, and watershed planning and implementation programs

By: 12/30/03

The coordination protocol will establish the structure necessary to:

- Integrate TMDL assessment work with water quality monitoring strategy implementation to leverage data collection resources.
- Prioritize the allocation of CWA grant program dollars, as appropriate, to assist in the development of watershed management plans and TMDLs.
- b. Utilize coordination protocol to share, verify, and validate existing qualitative and quantitative information related to impairments and impairment reductions.
- c. Utilize coordination protocol to prioritize future impairment reduction efforts.
- d. Improve the timeliness and quality of TMDL development through optimal use of all existing resources.
- Integrate TMDL assessment work with water quality monitoring strategy implementation to leverage data collection resources

By: 9/30/03

- Prioritize the allocation of section 319 CWA grant program dollars, as appropriate, to assist the development and implementation of TMDLs.

By: 2005 award cycle

- Consult with IDEM's TMDL Advisory Group on TMDL approaches.

Ongoing

- Administer the 7 existing contracts to ensure contracted work is complete and TMDLs are established for 15 water segments

By: 12/31/03

Conduct a minimum of 15 TMDLs for 2004. IDEM will provide a specific list of water segments to have TMDLs developed in 2004 and 2005

By:1/31/04

- Reevaluate and revise the current TMDL strategy to identify and incorporate the most effective and efficient approaches to developing TMDLs.

The revised strategy will:

- 1. Develop streamlined protocol for E.coli TMDLs.
- Partner with America's Clean Water Foundation to utilize load duration curve analysis to identify possible sources of E. coli loads and establish E. coli load reduction strategies for E. coli impaired watersheds
- Use load duration curve analysis information to complete TMDLs for 30-40 E. Coli impaired watersheds

By: 8/31/03

- 2. Develop protocol for impaired biotic community TMDLs.
- Work with US Fish and Wildlife (USF&W) to develop a streamlined process to better define impaired areas and identify the sources of impairments in the defined areas
- Pilot the US Fish and Wildlife process and use the information collected to complete TMDLs for 3–5 impaired biotic community watersheds

By: 12/31/03

3. Develop outreach protocol for TMDL development

By: 12/31/03

4. Complete pilot watershed TMDL.

By: 5/31/04

5. Develop protocol for watershed TMDLs.

By: 8/31/04

- To realize prioritization of 319 grant funding towards implementation of the TMDL revised strategy IDEM will work to establish several watershed specialist positions.

By: 12/31/03

These positions will:

- 1. Assist local watershed groups, soil and water conservation district (SWCD) boards, and local and regional governments in developing and implementing watershed plans for controlling non- point source pollution.
- 2. Liaison with the TMDL program and local entities.
- 3. Identify and fulfill training needs for local watershed coordinators and watershed groups.
- 4. Coordinate with IDNR/Purdue University conservation program specialists, NRCS, SWCDs, IDEM's TMDL program and watershed management program staff, and other agency staff as needed.
- 5. Work with local watershed groups to establish the environmental goals for their watershed(s) and establish a timetable to achieve these goals including a date these actions will be taken.
- 6. Coordinate with outside contacts to recognize and support an integrated watershed management approach.
- a) Establish watershed planning and TMDL implementation coordination efforts that provide:
- An information specialist to provide education and outreach for watershed planning and protection and TMDL implementation.
- Several watershed specialists to accomplish coalition building and coordination among all interested and affected parties working to improve and protect watersheds throughout the state.

By: 12/31/03

b) With assistance of watershed specialists, develop master contact list for all OWQ TMDL and CWA grant programs to use to establish external coordination links

By: 6/30/04

c) Develop coalition protocol for OWQ's TMDL and watershed planning and implementation programs to effectively utilize external coordination links

By: 3/31/04

d) Utilize coalition protocol to share, verify, and validate existing qualitative and quantitative information related to impairments and impairment reductions

By: 6/30/04

e) Utilize coalition protocol to help prioritize future impairment reduction efforts

By: 6/30/05

Target Runoff and Sewer Overflows Through Wet Weather Programs

PPG (Y/N): Y

EPA Role: Region 5 will make a preliminary identification of such LTCPs by 12/31/03 using the following criteria to help identify these priorities:

- Proximity to high-priority beaches as defined by EPA or the State.
- A Long Term Control Plan extending beyond the life of the current permit.
- Complex treatment systems with known problems related to wet weather.
- A location in a priority area as identified by either the Region or the State (sources for such determination will likely include 305 (b) reports and 303(d) lists).
- Existing compliance problems.
- Proximity to 1453 area.
- Potential for use of a battery of compliance assistance tools.
- Satellite communities (tributary to larger systems) that have SSO problems.

Facilitation of water quality improvements through the implementation of the Federal Phase II storm water program as well as review and approval of 106 Combined Sewer Overflow Long Term Control Plans.

- Implementation of Phase II Storm water program
 - a) Seek and receive EPA approval of Indiana's Phase II stormwater rules

EPA Role: EPA will review and approve

By: 7/31/03 Seek Approval

b) EPA Guidance for MS4 permit compliance, enforcement, as well as interaction between MS4 and TMDLs.

By: 10/31/03

c) Produce and Implement outreach and technical assistance plan for Phase II municipal entities, construction, and industry, Rule 13 under 104(b)3 grant.

By: 9/30/04

d) Stormwater, Phase II Oracle Stormwater Compliance Database development and implementation.

By: 9/30/04

e) Review and approval of rule 13 Notices of Intent submitted

By: 4/30/04 providing sufficient resources

f)	Obtain contractor(s) to assist IDEM with review of Rule 13 receivables, and input
of data	into the Rules 5 and 6 databases and GroupWise Document Management
System	n (DMS).

By: 1/31/04

g) Review and approval of baseline water quality characterizations submitted by communities

By: October, 2004 - Ongoing

h) Review and approval of updates on program implementation requirements submitted by communities

By: 4/30/05 - ongoing

i) Review and approval of Rule 5 NOIs for 1-5 acre construction sites. IDEM, under the MOU will have DNR review plans.

By: Within 1 month of agency receipt.

j) Coordinate with Rule 13 entities as they develop rule 5 equivalent programs

By: October 2004

k) Develop a strategy for the Reissuance of existing Phase I Rule 6 permits.

By: 12/31/03

I) Review of Initial Submissions of Conditional No-Exposure Exclusions certifications submitted by industries after the affective date of revisions to Rule 6

By: 12/31/04

m) Work through the Compliance / Enforcement Team to develop a stormwater phase II enforcement strategy.

By: 9/30/04

- 2. Combined Sewer Overflow Long Term Control Plans
 - a) Ensure remaining CSO communities without requirement under NDPES permit for submission of LTCP have an enforceable mechanism requiring submission of LTCPs.

By: 1/1/04

b) Create Schedule for action on all submitted long-term control plans.

Complete initial review of all plans received by 4/1/03, before 7/1/04

Complete initial review of all plans received by 4/1/04, by 7/1/05

c) Use Performance Partnership Agreement funds to obtain contractor assistance for the review of models in LTCPs as well as provide overtime for staff review of LTCPs,

By: 1/31/04

d) Identify and coordinate LTCP reviews of all federal 'priority' CSO LTCPs with USEPA Region V and USEPA provide technical assistance.

By: 9/1/03

Focus Water Quality Monitoring Efforts

PPG (Y/N): Y

EPA Role: The Region will host periodic conference calls with the State on PCS modernization.

Scarce state (and federal) resources for water quality assessment and monitoring and the incredible task to thoroughly characterize Indiana's rivers, streams and lakes dictate that we focus our efforts to foster the most improvement in water quality possible. OWQ's Assessment branch will work with others to evaluate essential programs such as:

- 1. Monitoring and assessment of our waters.
- 2. Identification of causes and sources of impairments.
- 3. Application of appropriate strategies to restore impaired waters.
- 4. Assessing the effectiveness of the restoration strategies in resolving the problems.

The current monitoring strategy incorporates a five-year rotating basin approach and includes a probabilistic sampling scheme that allows us to make a statistically valid assessment of all of our rivers and streams at least once every five years. The probabilistic scheme, however, provides for only minimal assessment of individual waters (30-40 sites per basin) which limits our ability to identify individual waters within a basin that may have impairments. Minimal resources are currently being allocated to the identification of sources and causes (important for identifying and applying appropriate restoration strategies) and almost no resources are allocated to follow up studies to evaluate the effectiveness of the restoration strategies in resolving the identified water quality problem. (This will become more important as we continue to develop and implement TMDLs and other restoration strategies). These activities should serve as the basis for directing resources in other areas of the office (National Pollutant Discharge Elimination System (NPDES), 319 funds, SRF, and others). All possible ways to get support for these efforts (obtaining additional resources, EPA assistance, use of local assessment efforts etc.) will be explored.

EPA has identified improved water quality monitoring and assessment as a national priority and one which should be a major focus of states and tribes in the next few years. IDEM's Office of Water Quality (OWQ) has developed a Surface Water Quality Monitoring Strategy that contains the necessary elements to provide the information for essential OWQ programs and the public. This strategy has been recognized nationally by EPA as a "model" strategy and contains monitoring programs that provide for an overall assessment of our waters, identification of the sources and causes of water quality impairments, and assessment of the effectiveness of control strategies utilized to resolve these problems. Our challenge is to find adequate resources to implement as much of the strategy as practical.

- 1. IDEM will focus on ways to more fully implement the monitoring strategy and integrate it into our watershed activities by:
 - a) Evaluating and implementing ways to obtain and/or realign available OWQ resources to help fill any remaining information needs

By: 12/31/03	
Dy. 12/31/03	

b) Reviewing and prioritizing the elements of the Monitoring Strategy to assure that the Strategy is focused on providing the information necessary to carry out essential OWQ programs with available resources

By: 3/31/04

- c) Exploring ways to work cooperatively with other agencies (federal, state, and local) to supplement OWQ activities by:
- Developing inventory of potential resources
- Contacting potential resources to determine cooperative status
- Developing plans to incorporate cooperative activities into monitoring strategy

By: 6/30/04

- 2. IDEM will work with EPA to assure that Indiana's Surface Water Quality Monitoring Strategy is consistent with the Final "Elements of a State Water Monitoring and Assessment Program" as best as practical:
 - a) IDEM will review the their Surface Water Quality Monitoring Strategy to determine consistency with the new EPA guidance

By: 12/31/03

b) IDEM will coordinate with EPA to develop a schedule to make IDEM's Monitoring Strategy consistent with the new EPA Guidance

By: 6/30/04

c) IDEM will revise Monitoring Strategy.

EPA Role: Work with IDEM to strengthen and complete strategy. Review strategy pieces as requests. Attend meetings/calls as requested (and as resources allow).

By 9/30/04

3. Collect and compile information necessary for the submission of the 2004 Consolidated List Report (formerly the 305(b) and 303(d) reports)

By: 3/31/04

a) IDEM will provide a draft 2004 consolidated list for public comment.

By: 8/1/03

b) IDEM will provide a final 2004 consolidated list to EPA for approval.

By: 4/1/04

c) Provide water quality data from Assessment Information Management System (AIMS) to US EPA upon request.

By 12/1/04

d) As resources allow, work with US EPA on developing a mechanism for transferring data from AIMS to STORET via SIM V2.0 or other program.

EPA Role: Provide assistance in getting STORET 2.0 linked to AIMS. Provide training in Region on STORET 2.0 and related modules.

By: 12/1/04

 d) IDEM will explore funding sources and other potential partners for submitting data to STORET.

By: 6/30/04

4. Participate with US EPA in jointly reviewing the State's bioassessment program against the national guidance on what constitutes an adequate bioassessment program and identifying areas that need additional attention.

EPA Role: Actively work with EPA Headquarters (HQ) to finalize and provide the national guidance, and will jointly review Indiana's program with IDEM. Seek additional funds, assistance and tools from HQ to assist the State in improving its bioassessment program.

Ongoing

5. Work with ORSANCO and other partners to evaluate methods used for large river biological assessments. Work with ORSANCO, Region 5 and other partners to assess the condition of large rivers within the Region.

Ongoing

EPA Role: Coordinate efforts with IDEM, ORSANCO and other states and partners to evaluate methods used for large river bioassessments within the Mississippi watershed using 104(b)(3) funds. Utilizing the information gained from the 104(b)(3) projects, an assessment of the condition of large rivers will be conducted with ORD's REMAP funding, with fieldwork beginning in FY'04.

6. Continue to work towards the development of the biocriteria program.

Ongoing

EPA Role: Provide technical assistance and program support for the development of the biocriteria program. Continue to work with the Midwest Biodiversity Institute and coordinate efforts with the states to promote and assist with the development of bioassessment and biocriteria programs. Hold at least one meeting in FY '04.

7. Implement activities outlined in the final nutrient criteria development plan which will lead to a nutrient criteria rulemaking by 2006 and adoption of nutrient standards by 2007. Provide EPA with annual updates on progress implementing the plan.

By: Updates provided annually.

EPA Role: Provide funding for State projects supporting nutrient criteria development up to amount provided by HQ. Facilitate nutrient RTAG. Review State's annual updates.

Increase Efforts to Maintain Safe Drinking Water

PPG (Y/N): Y

EPA Role:

Effectively develop and implement the Safe Drinking Water and Source Water Protection approaches. Track, assist and assess State to ensure:

- A) drinking water quality data is collected and reported
- B) knowledge about the ground water resource is advanced
- C) health benefits for citizens are maximized through resource and source water protection barriers, and treatment installation when necessary.

Maintain Drinking Water Program

PPG (Y/N): Y

EPA Role:

The Region 5 Ground Water and Drinking Water Branch(GWDWB) will ensure the accuracy and completeness of SDWIS/FED data submissions and provide technical assistance and guidance on data management issues as resources allow. In addition, the Region will keep IDEM up-to-date on new/revised reporting requirements.

a) Maintain a data management system that tracks requirements for all rules. Convert all Drinking Water Branch Access Databases to Safe Drinking Water Information System (SDWIS) Database

By: end of FY2005

- Maintain inventory, total coliform rule and enforcement modules in SDWIS

Daily

- Maintain Access Database for all other rule requirements.

Daily

- Convert nitrate/nitrite rule, radionuclide rule, inorganic chemical rule, surface water treatment rule, total trihalomethane rule, interim enhanced surface water treatment rule, stage 1 disinfection byproducts rule and the consumer confidence rule databases to SDWIS

By: 9/30/03

- Convert volatile organic compound rule, synthetic organic compound rule, lead and copper rule and the waiver program databases to SDWIS

By: 9/30/04

- b) Migrate SDWIS/State required information to SDWIS/Fed quarterly such as inventory, violation and enforcement information.
- Submit or migrate inventory information, maximum contaminant level (MCL) violations, action level (AL) and treatment technique (TT) violations, monitoring and reporting (M/R) violations, enforcement actions and public notification (PN) information from SDWIS/State to SDWIS/Fed

Quarterly

- c) Determine violations for all rules and maintain an adequate compliance assistance program.
- Monthly, quarterly and annual MCL, AL, TT, M/R and PN violations are identified by the databases and violation notices are issued

Monthly, quarterly and annual

- Quarterly violations of the operator certification, construction permitting, capacity development, and wellhead program are issued

Quarterly

- Compliance assistance is provided by technical staff to affected PWS before and after violation notices are issued

Ongoing

- Staff work to resolve major violations immediately through compliance assistance efforts MCL violations will be responded to by field staff within 1 day of receipt for acute contaminants and within 5 working days for chronic contaminant MCLs.

Ongoing

d) Provide an adequate laboratory certification program

EPA Role: The Region 5 GWDWB will support the State laboratory certification program by assessing the ISDH laboratory and its laboratory certification program every three years to document that the State is successfully implementing the current federal regulations.

- IDEM provides this program in cooperation with Indiana State Department of Health (Indiana State Department of Health (ISDH)). IDEM will continue to pursue with Indiana State Department of Health (ISDH) a memorandum of understanding (MOU) of issuing laboratory certification to drinking water laboratories
- Provide EPA Region 5 with a list of the Indiana's certified laboratories -

By: 7/04 and 7/05

- e) Keep adequate records of information and State decisions
- All incoming and outgoing records are stored numerically by PWS identification number in boxes for microfilming

Ongoing

 All generated compliance letters are stored electronically as an e-file in the Branch Server

Ongoing

f) Maintain Operator Certification Program

EPA Role: Region 5 GWDWB will inform IDEM of the annual operator certification reporting requirements as required under the 1996 Safe Drinking Water Act (SWDA) amendments. Region 5 will work closely with the State to assure reports are submitted on time and that they meet Federal requirements. Region 5 will inform IDEM of national and regional guidance and related activities. Region 5 will review the annual report as well as the Operator Certification Expense Reimbursement Grant (ERG) Report.

- Apply for the Education Reimbursement Grant for training of all new certified operators of system 3,300 or less.

By: before 9/30/03

- Use training funds to hire new staff or a contractor to perform training -

By: 7/31/04

- Train an estimated 100 grandparented operators per month once staff/contractor is in place
- Continue to work with trade associations on Operator's educational training

Ongoing

- Work with Association of Boards of Certification to provide examinations for the operator certification tests

Ongoing

- g) Perform Sanitary Surveys and provide technical assistance at public water systems
- Complete sanitary surveys at community and non transient, non community systems at least once every 5 years or every 3 years if required by the SDWA
- Perform follow up inspections at transient non community systems identified as part of the screening surveys conducted along with source water assessment field data collection - as resources allow, follow ups will be made when the inspector is in the area performing inspections at community and non transient non community systems
- h) Drinking Water Construction Permits
- All permits issued on time reported monthly

reported monthly

- For new system, ensure that they have met new system capacity development requirements

Ongoing

i) Source Water Protection Efforts

EPA Role: Region 5 GWDWB will support assessment and protection programs by State and local agencies by:
a) developing partnerships with other U.S. EPA programs and other Federal agencies to assist States with assessments and protection; b) developing assessment and protection tools for use by States and locals; and c) by using outreach to get other parties to support source water protection.

- Complete all Wellhead Plan reviews and make final determinations -

By: 7/31/04

- Complete all Source Water Assessments

By: 5/31/05

- j) Complete Annual Resource Deployment Plan (ARDP). The plan specifies both IDEM's and EPA's activities relating to carrying out the specific requirements of the SDWA. The ARDP also notes those activities that IDEM may not be able to complete without increased resources.
- Submit completed ARDP to EPA-

By: January 1 each year

k) Upgrade the Drinking Water Watch Web site. The following modification/additions to the Drinking Water Watch website will be made in order to better serve and meet the requests of the public.

Additional Search Capabilities for:

- * Type of water system
- * Type of samples and results

Display of Additional Types of Data on:

- * Monitoring schedules
- * Summarized field sample results
- * Lead and Copper summaries

Modification of Existing Pages to:

- * Support links to new searches
- * Support links to new data

By: 7/1/04

Data Management

EPA Role: Region 5 GWDWB will ensure the accuracy and completeness of SDWIS/FED data submissions and provide technical assistance and guidance on data management issues as resources allow. In addition, Region 5 will keep the State up-to-date on new/revised reporting requirements or changes.

Hire a contractor to enhance the performance of SDWIS by doing the following tasks that are not being developed for SDWIS by EPA:

- * Migration of old (legacy) data from current database into SDWIS such that analytical results from inception of all public water systems to present time transferred into SDWIS with correct associations to each particular water system and its facilities;
- * Migration of monitoring frequencies/schedules from current database into SDWIS such that accurate sampling schedules/monitoring frequencies of all public water systems transferred into SDWIS with correct associations to each particular water system and its facilities;
- * Provide training and technical assistance to the technical staff (with using all of the functions of SDWIS/State) on the following:
- a) Technical assistance will be used to ultimately perform compliance determination for all public water systems in the state
- b) Training will be conducted on all applicable areas of SDWIS, depending on the state and/or federal rule(s) and the individual compliance officer(s)

By: 10/1/04

Implement New Requirements

PPG (Y/N): Y

EPA Role: See below.

a) Improve the ability of PWSs to meet the requirements of the SDWA by improving implementation of the Capacity Development Rules and Strategy

EPA Role: Region 5 GWDWB will inform IDEM of the annual Capacity Development reporting requirements as required under the 1996 SDWA amendments. Region 5 will work closely with the State to assure reports are submitted on time and that they meet Federal requirements. Region 5 will inform IDEM of national and regional guidance and related activities.

- Identify public water system in need of technical, financial, and managerial capabilities

Ongoing

- Work with a contractor, RCAP, to provide direct assistance to at least 50 systems

Report quarterly

- Finalize the handbook for new systems

By: 12/31/03

- b) Vulnerability assessments and emergency response planning
- Provide assistance to community systems serving over 3,300 population in meeting federal requirements report number of systems assisted quarterly

Report quarterly

- Provide assistance to community systems serving less than 3,300 population and non community systems - report number of systems assisted quarterly

Report quarterly

c) Promulgate new rules

EPA Role: U.S. EPA headquarters will continue to develop regulations and guidance to implement the 1996 amendments to the SDWA. The Region 5 GWDWB will assure that input from the State is requested and that IDEM's comments/issues are raised and presented to the national regulation development workgroups for discussion to help assure that regulations and guidance are appropriate and workable.

Region 5 GWDWB will review and comment on proposed State legislation and regulations to ensure consistency with Federal statutory requirements.

Region 5 GWDWB will provide training for IDEM staff on all new drinking water regulations within six months of final rule promulgation.

Promulgate 3 new (federal) drinking water rules (radionuclide rule, arsenic rule and long term 1 enhanced surface water treatment rule) in a timely manner including 2 year time extension period. Complete promulgation of the Drinking Water System Operational Rule

- Submit to the Water Pollution Control Board (WPCB) the re-codification of the federal radionuclide, arsenic and long term 1 enhanced surface water treatment rules into State rules for preliminary adoption.

By: 9/30/03

- Submit to the WPCB for final adoption of the radionuclide, arsenic and long term 1 enhanced surface water treatment rules.

By: 3/31/04

- Submit to EPA Region 5 Primacy Application package for the radionuclide, arsenic and long term 1 enhanced surface water treatment rules.

By: 8/31/04

- Submit to the WPCB for final adoption the Drinking Water System Operational Rule.

Notify all public water systems of the 3 new federal and 1 new State regulatory requirements.

By: 1/31/04

- d) Notify all public water systems of the 3 new federal and 1 new State regulatory requirements
- Provide copies of the new regulatory requirements for the radionuclide, arsenic, long term 1 enhanced surface water treatment rules, and Drinking Water System Operational Rule to the affected PWS.

By: 9/30/04

- Assists EPA in providing federal fact sheets of the radionuclide, arsenic and long term 1 enhanced surface water treatment rules and other information such as guidance to the affected PWS.

By: 12/31/03

Expand Resources of Existing Program

PPG (Y/N): Y

EPA Role: See below.

a) Provide adequate funding to carry out all functions of the PWSS program

EPA Role: Region 5 GWDWB will support IDEM's efforts to expand State program resources in order to ensure drinking water safety.

Region 5 GWDWB will work with IDEM to prioritize actions with new and existing resources that have the greatest likelihood of increasing the compliance rates (may not be enforcement actions, but could be efforts to educate or other compliance assistance) and work with IDEM on targeting of some of their new resources at a specific problem(s).

- IDEM will work with the State Budget Agency on the continued use of DWSRF Set-Aside money for program implementation until fees can provide program support (after July 2005) - ongoing and submit work plan yearly

Ongoing and submit work plan yearly after July, 2005.

- IDEM will begin collection of fees enacted by the Legislature starting in July 2004. The fees phase in years 2004 and 2005. Full annual fees will be collected beginning January 2006 - ongoing after July 2004

Starting July, 2004 and ongoing.

- Continue to use SEE personnel to assist with program implementation

Ongoing

- Pursue additional staffing resources for the program

Ongoing

b) Improve PWS monitoring and reporting violations with focus on small systems

EPA Role: The Region 5 GWDWB continues to accept drinking water enforcement referrals from the IDEM Office of Enforcement. The Region continues to issue enforcement actions to public water systems with drinking water violations.

Region 5 GWDWB will work with IDEM to identify the root causes of non-compliance with the different types of systems and work together to find solutions

- Continue the implementation of the Small System Laboratory Assistance Program with Indiana State Department of Health (ISDH) in doing the analyses of total coliform and nitrate samples for PWS serving population 100 or less.

Ongoing

- Refer all non compliant systems to enforcement

Ongoing

c) Apply for the Expense Reimbursement Grant for training of all new certified operators of system 3,300 or less before 9/30/03.

Use training funds to hire new staff or a contractor to perform training.

By: 7/31/04

Ensuring an Effective Point-Source National Pollutant Discharge Elimination System (NPDES) Program

PPG (Y/N): Y

EPA Role: Coordinate development of region-wide Compliance Streamlining Plan.

OWQ will continue to issue new, renewal, and modification of permits within statutory deadlines. OWQ will also continue to significantly reduce the number of administratively extended NPDES permits. In addition, the OWQ will implement agency wide initiatives concerning compliance program activities such as the inspection protocol, adherence to the Enforcement Referral Process, and implementation of a system for tracking and following up on Agreed Orders/Consent Decrees.

- 1. Enhancing Permitting Programs
 - a) Work with U.S. EPA to develop list of priority industrial/municipal National Pollutant Discharge Elimination System (NPDES) renewal applications.
 - 1) Create schedule for processing priority applications.
 - 2) Develop a permit issuance schedule for major and minor facilities for the next two fiscal years.

By: 7/1/03 and ongoing

b) Use Performance Partnership Grant Funds to pay overtime for work on priority NPDES Permit work.

By: 1/31/04

Fill out EPA Region 5's self-assessment questionnaire.

By: 2/1/04

- 2. Issue New and Modified Permits on Time
 - a) National Pollutant Discharge Elimination System (NPDES) Permits

Ongoing

b) Wastewater Construction Permits

Ongoing

3. Work with Indiana State Department of Health (ISDH) and U.S. EPA to develop by policy and rule, if appropriate, procedures for review of community-based alternative wastewater treatment systems.

Finalize approach by 9/30/03

4. Evaluate lower priority National Pollutant Discharge Elimination System (NPDES) renewals for opportunities to streamline renewals, establish general permits or permits by rule. Develop plan for lower priority National Pollutant Discharge Elimination System (NPDES) permits and begin to implement by 10/1/03.

By: 10/1/03 (and ongoing)

- 5. Implementation of Agency-Wide Inspection Protocols
 - a) Revise National Pollutant Discharge Elimination System (NPDES) Wastewater Inspection COP and document management procedures to incorporate Agency Inspection Protocol and Enforcement Referral Policies, and update existing state forms and inspection checklists as necessary. Provide training in use of these procedures/forms to wastewater inspectors and compliance staff statewide. Implement revised COP and refine process as necessary.

By: Initial training by 7/1/03, Ongoing training at monthly staff meetings

b) Complete Violation Letter format for Inspectors and Compliance Staff using Agency-Wide Protocols and develop/implement internal tracking system for minor violation follow-up and referrals to the Office of Enforcement.

By: Initial training - 7/1/03 Ongoing training at monthly staff meetings

c) Implementation of Agreed Order Follow-up Policy, and incorporate into NPDES Wastewater Inspections COP.

By: 7/1/03 and Ongoing

d) Revise all Inspector and Compliance Staff position descriptions to reflect adherence to revised agency-wide policies and protocols

By 9/30/03

e) Assist in the Completion and Implementation of Agency-Wide Sampling Protocol Lead by Office of Criminal Investigation (OCI). Utilize available funding to procure necessary sampling equipment and supplies in order to implement sampling protocol.

By: Per Agency Schedule, no later than June 2005

f) Assist with "sector" projects and other initiatives developed by the C/E Team.

By: 1/1/03 and ongoing

- g) Improve system for handling water compliance information.
- 5. Initiate and examine opportunities for increasing coordination between Data Management and Facilities Compliance.

By: 9/30/03, Ongoing

6. Develop plan for achieving close to real time access to DMR information.

By: 4/30/04

7. Examine opportunities and constraints for expanding use of available PCS fields.

By: 4/30/04

8. Reevaluate priorities for Operator Assistance program under 104g grants. Implement criteria for determining which communities to assist.

By: September 2003 and Ongoing (subject to continued federal funding)

9. Develop reporting template for Operator Assistance (Coordinate with Drinking Water Branch on infrastructure security issues).

By: 1/31/04

10. Target priority wastewater facilities and personnel for compliance activities.

EPA Role: The Region will work with the State to develop an efficient and effective enforcement strategy, and to the extent necessary, coordinate with HQ to gain support for options in that strategy which may vary from the traditional coverage inspection requirements.

Target priority wastewater facilities and personnel for compliance activities and implement resulting work plan. Work with Office of Enforcement and U.S.EPA to assign priorities to facilities for inspection and ensure that staff resources are focused on facilities with greatest contribution (or potential to contribute) to water quality problems. Participate in Region V National Pollutant Discharge Elimination System (NPDES) Compliance 'Streamlining'.

By: October 2003, Ongoing

a) IDEM will develop and implement a plan to inspect 70% of its majors, 30% of its minors and conduct pretreatment audits on 20% of pretreatment programs annually.

Annually

b) IDEM will provide EPA Region 5 with a list of facilities targeted for wastewater inspections.

By: 1/1/04 and 1/1/05

c) IDEM will work with Region V on Headquarter's special initiatives such as developing statistically valid noncompliance rate project for CSO communities by conducting inspections and completing the project checklist for approximately 25 facilities.

By: 6/30/04

d) Citizen complaints received by IDEM or EPA concerning facilities for which EPA has initiated enforcement, will be referred to EPA.

EPA Role: Citizen complaints received by EPA will be referred to IDEM for follow-up.

e) For complaints concerning sludge and pretreatment matters, IDEM should report back the disposition of the complaint to USEPA upon conclusion of the investigation.

By October 2003, Ongoing

11. Continue to coordinate with EPA to identify and implement improvements to existing pretreatment program, including preparation and timely issuance of industrial pretreatment permits, oversight/audits of delegated local programs, and explore opportunities to pursue pretreatment program delegation from EPA.

EPA Role: EPA will review several POTW annual reports to evaluate the state program.

a) IDEM will review Annual Reports for POTWs with approved Pretreatment programs.

Ongoing

b) Review the Pretreatment Audit and Pretreatment Compliance Inspection checklists (with Region 5 assistance) to identify opportunities to streamline them.

By: 6/30/04

c) Incorporate recommendations from Region 5 on the IDEM Annual Report format.

By 6/30/04

d) IDEM will conduct audits and/or PCI inspections at 50% of the pretreatment facilities.

Bv: 6/30/05

f) IDEM will compile an inspection plan for the waste water treatment facilities that will include a list of facilities that we will be inspecting.

By: 2/1/04

e) Industrial users will be inspected twice each five years with ongoing review of semi-annual periodic reports. IDEM will develop an inspection schedule for IUs located in non-approved pretreatment cities.

EPA Role: EPA will conduct 10 inspections of IUs in non-approved pretreatment cities.

By: October 2003, Ongoing

12. Continue to implement the wastewater operator certification and continuing education programs and identify/implement improvements to the existing programs and procedures. Work with internal and external stakeholders in developing improved customer service to operators, including outreach to the public on program requirements and access to certification and training course information.

By: October 2003 (and ongoing)

13. Work with U.S. EPA on National Pollutant Discharge Elimination System (NPDES) Compliance Streamlining Project. Develop implementation plan based on results of project.

By: 12/31/03 (and ongoing)

14. Will develop a list of permits that will be prioritized.

By: 1/1/04

15. Will provide to EPA a list of prioritized permits for their review.

By 2/1/04

16.	As resources allow,	will participate o	n the Region	5 Mercury	Permitting a	and PMP
workgro	up.					

Ongoing

17. Complete the Program Integrity Self Assessment form.

EPA Role: EPA will participate in the national Program Integrity Workgroup along with the designated Region 5 states.

By: 2/1/04

Protect Wetlands PPG (Y/N): Y

Approximately 85% of the state's original wetlands have been lost in the pursuit of other priorities (agriculture, development, etc.), and the Department (and the state) has set a goal of no net loss of wetlands.

Depending on the outcome of legislation in this year's General Assembly, OWQ will work with DNR and others through rulemaking or implementation of new (or existing) laws, to provide the highest level of protection possible of Indiana's remaining wetland resources. IDEM will also participate in federal discussions about future interpretations of the federal Clean Water Act. As needed, IDEM will also work with the general public and the legislature on future legislation to ensure appropriate protection of the wetland resources. IDEM is committed to the protection of the state's remaining wetland.

IDEM will work with the Governor's Wetland Task Force established in June 2003 to help craft legislation relating to isolated wetlands for 2004 and set state policy for wetlands.

- a) Develop and utilize a wetland regulatory tracking database.
- b) Develop a work plan for the database development contractor

By: 7/31/03

c) Have contractor implement database development work plan

By: 12/30/03

d) Based on available resources, populate database with historical data

By: 9/30/04

- e) Pending completion of the wetland regulatory tracking database and based on available resources, develop wetland compliance and enforcement strategy.
- Utilize populated wetland regulatory tracking database to identify sites that require compliance and enforcement actions

By: 12/31/04

- Develop standard operating procedure for prioritizing and implementing compliance and enforcement actions

By: 6/30/04

- f) Develop Floristic Quality Index (FQI) to characterize Indiana wetlands.
- Explore contractor options for developing the Indiana FQI

By: 12/30/03

- Develop work plan for developing the Indiana FQI

By: 6/30/04

- Implement work plan to develop the Indiana FQI

By: 6/30/05

Use Good Science and Sound Policy to Shape and Implement Water Quality Standards

PPG (Y/N): Y

IDEM is committed to utilizing sound science and policy to develop water quality criteria and the use of sound policy to fairly develop and implement Water Quality Standards.

Indiana was one of the first states to fully implement the recommended Federal water quality criteria for toxics (EPA Water Quality Criteria Documents 1980-1986) and the recommended bacteriological criteria (E. coli) in the revisions to its standards promulgated in 1990. It was also the first state to adopt the Great Lakes Water Quality Guidance into its own state standards in 1997.

- 1. IDEM has committed to a "workgroup" approach to developing proposed water quality standards and implementation procedures to ensure sound policy and science is used to make needed revisions as expeditiously as practical. A triennial review of the state's water quality standards should be mostly completed within the next biennium.
 - a) IDEM has put together a group of statewide stakeholders to regularly meet during the Triennial review rulemaking and provide recommendations to IDEM on the process and main policy issues (ongoing).
 - b) Statewide stakeholders have begun to meet on at least a quarterly and on an as needed basis

Starting August, 2002 through at least June 2004

c) Based on discussion by the stakeholders, IDEM will draft a public participation strategy

By: 7/1/03

d) Public participation plan finalized.

By: 9/30/03

- 2. IDEM will work with external stakeholders to develop policy on specific Triennial rulemaking issues. Discussion in these workgroups will, to the highest degree practical, include analysis of background information and the most current research and information.
- 3. IDEM will establish external workgroups and specific work plans to provide recommendations on specific Triennial rulemaking issues to include
 - a) E.coli

First Notice by 6/1/03

Second notice by 12/1/03

Preliminary adoption by 6/1/04

Final adoption by 12/31/04

b) Mercury

First notice by 6/1/03

Second notice by 12/1/03

Preliminary adoption by 6/1/04

Final adoption by 12/31/04

c) Antidegredation/OSRW

First notice by 3/1/03

Second notice by 12/1/03

Preliminary adoption by 7/31/04

Final adoption by 1/31/05

4. Rule changes that based on best science, updates of existing rule language, and technical corrections and clarifications that have a reasonable potential of minimal controversy.

First notice by 6/1/03

Second notice by 11/1/03

Preliminary adoption by 5/31/04

Final adoption by 8/31/04

5. Other Triennial Issues.

IDEM will sort out what issues remain and initiate rulemaking(s) as appropriate.

a) Workgroup will be established

By: 12/31/03

b) Workplan for rulemaking will be developed

By: 3/31/04

c) First Notice(s) will be developed

By: 6/1/04

d) Second Notice(s) will be developed

By: 1/1/05

e) Preliminary adoption

By: June 2005

- 6. IDEM will pursue a federal grant to provide technical assistance to the external stakeholders in conjunction with IDEM technical staff.
 - a) If the grant is awarded, IDEM will:

Develop contract by August, 2003; Issue contract by November 2003

- 7. IDEM will reach out to the academic community in Indiana in order to leverage in-state technical expertise.
- 8. IDEM will develop contact list and general invitation letters to academic communities

By: June 2003

9. IDEM will send out letters and follow up with interested parties

By: 8/1/03

- 10. IDEM will collaborate with EPA staff on these rulemakings in order to maximize the exchange of technical information and ideas as well as to get their input on rulemaking related issues.
- 11. IDEM will coordinate with EPA on participants in workgroups

By: 7/1/03

12. IDEM will consult with EPA on specific rulemakings on second notice and preliminary adoption

Work with the Public and Other Governmental Authorities to Address Water Quality Problems.

PPG (Y/N): Y

To work proactively to discover, coordinate, and focus available resources within and outside of the IDEM to addressing water quality problem areas. Explore additional federal funding opportunities, identify local efforts and interest and investigate non-profit and university efforts aimed at improvements in water quality. Try and integrate these opportunities into priority water quality improvement efforts.

A variety of financial resources exist in the state of Indiana for addressing water quality issues. These resources have been used by different agencies with a variety of mandates and individual focuses, providing some beneficial effect on their own. Focused coordination of those resources to priority water quality problems will help to leverage funds for effective water quality improvements.

1. Implement the strategy defined in goal number 1 – Progress on Restoring Impaired Waterways – to better utilize data and create internal and external coordination links

By: 6/30/05

- 2. Determine what other agencies and entities are doing to protect and improve water quality in Indiana.
 - a) Develop a protocol to systematically identify external water protection and improvement efforts being done by other agencies and entities

By: 12/31/03

b) Implement the protocol to systematically identify external water protection and improvement efforts being done by other agencies and entities

By: 3/31/04

3.	Explore options to effectively share identified external water protection and improvement
efforts b	eing done by other agencies and entities.

a)	Identify possible IDEM media and communication tools that may be used to
reach a	ppropriate interested parties

By: 6/30/04

b) Solicit ideas for effective information sharing techniques from other agencies and entities

By: 9/30/04

- 4. Share with other agencies and entities information on water protection and improvement efforts being done by IDEM other agencies and entities to identify resource-leveraging opportunities.
 - a) From information sharing options identified, develop protocol to utilize most effective options

By: 12/30/04

b) Implement information-sharing protocol

By: 3/31/05

c) Based on shared information work with other agencies and entities to identify resource-leveraging opportunities

By: 6/30/05

- 5. As determined necessary for cross-program and/or cross-agency concerns, identify appropriate contacts and work to establish open communication and standard operation procedures and/or memorandums of understanding to ensure continued coordination.
 - a) Seek approval for a NRCS liaison position that will assist IDEM's Watershed Branch Chief by coordinating the duties of the watershed specialist positions

By: 4/30/04

This position will:

- Develop training needs and a training plan for the watershed specialist positions

By: 12/31/04

- Maintain a common message and a common understanding of watershed planning, source identification, and other processes.

Ongoing

- Review and comment on submitted watershed plans

Ongoing

- Gather materials for joint reports on the progress of local groups

Ongoing.

b) Seek to establish a Watershed Advisory Council to meet on a quarterly basis and communicate regularly on water quality related issues

By: 12/31/03

The Watershed Advisory Council could be comprised of representatives from:

- IDEM (Watershed Branch chief, Watershed Management Section chief, TMDL program leader, and Watershed Specialists),
- IDNR (Lake and River Enhancement Program chief)
- Purdue University (Conservation Program Specialists),
- Indiana Association of Soil and Water Conservation Districts (association director and contracted Watershed Information Specialist),
- NRCS (NRCS/IDEM Liaison and a representative of technology program staff),
- Farm Bureau, and
- The Nature Conservancy.

Focus Internal Resources to Address Most Significant Water Quality Issues

PPG (Y/N): Y

Conduct an initial review and then periodically review to ensure that all areas of the office are focused on highest, best use of staff time and resources to gain water quality improvements and most critical services to citizens.

- 1. Ensure that OWQ Priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting the water quality across the state.
- 2. Conduct a semi-annual review of OWQ activities to ensure that all work continues to be prioritized to provide efficient/effective services and is oriented toward making a significant difference in water quality improvement and protection. The review will include, at a minimum, a presentation by each branch chief on current activities and any planned changes to those activities to the OWQ senior management team. Adjustments as necessary will be made by the team.

By: 7/1/03 and biannually thereafter

3. US EPA Region 5 Priorities

Region 5 is currently developing priorities as a part its process for developing a Regional Plan. This activity will be completed by the end of calendar year 2003. These priorities will be based, in part, on current priorities which are consistent with IDEM's priorities. When the new priorities are final they can be included in this section.

4. Roles of IDEM and US EPA Region 5 under this Agreement

At its core, this agreement defines the roles that both IDEM and US EPA Region 5 will play in protecting the environment and public health in the state of Indiana and maximizing efficient use of each agency's limited resources.

IDEM and US EPA Region 5 recognize the primary role of IDEM in administering federal environmental programs delegated to the state under federal law and in carrying out state programs prescribed under state law. Beyond this, US EPA Region 5 recognizes the commitment of IDEM to using all of its authorities to protect the environment and health of the citizens of Indiana. The federal role played by US EPA Region 5 in assisting the state includes: addressing multi-state or national issues directly; implementing programs not delegated to IDEM; and working on targeted sectors, watersheds, airsheds, or regions in conjunction with IDEM.

Several activities are common to both IDEM and US EPA Region 5, such as permitting, compliance, enforcement, monitoring, and outreach. Permitting is perhaps IDEM's most visible activity. Federal and state statutes require businesses and communities to obtain permits to ensure protection of human health and the environment. Permits are one means of controlling environmental impacts. They promote monitoring and the collection of invaluable data. Ensuring compliance with permit or statutory requirements remains a high priority with both agencies. We employ an integrated set of compliance assistance, compliance monitoring and enforcement tools to encourage and ensure compliance with the law, correct environmental problems and deter future violations. US EPA's research and both agencies' environmental monitoring efforts are the foundation for many of our activities and are essential for improving services and strengthening our ability to carry out mandates. In summary, both agencies agree to the following basic partnership roles:

IDEM

- Delegated federal programs administration
- Permit review and issuance
- Enforcement/facility inspections
- Compliance assistance
- Public outreach and education
- State environmental programs administration
- Customer service
- Technical assistance

US EPA Region 5

- Permit peer review for delegated programs
- Permit issuance for non-delegated programs
- Enforcement/facility inspections
- Compliance assistance
- Public outreach and education
- Ensure national consistency
- Address interstate issues

- Technical assistance to IDEM
- Review of federal programs delegated to state

The federal government has a fundamental responsibility arising from several acts of Congress to ensure the integrity of the nation's environment and the health of its diverse citizenry. Since pollution does not respect political boundaries, US EPA must ensure that a consistent, level playing field exists across the nation. US EPA Region 5 provides leadership in addressing environmental problems that cross state, regional and national borders. Region 5 works with its many partners--other federal agencies, states, tribes, and local communities--to address high priority environmental problems. Region 5 also reviews state program performance and assists states and other partners in building their capacity to ensure protection of public health and the environment. Region 5 will continue to provide Indiana with funding for its base programs and specific projects which will achieve environmental results consistent with Region 5 and IDEM priorities set forth in this agreement and will evaluate Indiana's programs to ensure fiscal integrity. The Region will continue to build state capacity for undelegated programs with a goal of delegating those programs to the state in the near future.

This agreement is based on the commitments made by IDEM when federal programs were delegated to the agency. IDEM recommits to carry out the provision of those delegation/authorization agreements. This agreement serves as a guide to implementation, but does not supersede any existing federal statute, regulation, cooperative program agreements or other agreements in support of program delegations. US EPA Region 5 and IDEM RCRA compliance assistance staff will meet annually to exchange information about the compliance assistance tools each has developed to assist the RCRA regulated community.

5. Measuring Environmental Results

Under the NEPPS, state and federal program managers are directed to focus more on "improving environmental results." To achieve this new focus, the NEPPS calls for setting environmental goals and using environmental performance measures (i.e. indicators) to keep better track of our progress.

Both IDEM and US EPA Region 5 have experience working with characterization of environmental conditions. IDEM has historically collected ambient environmental quality data and reported its findings. However, we must improve linkages between actual environmental conditions and program performance, so that we can better assess our effectiveness over time. NEPPS should also help us to apply our resources where they will do the most good.

IDEM uses indicators as the tools to assess progress toward achieving the goals and objectives set throughout this agreement. US EPA Region 5 has encouraged states to adopt oriented performance measures to track environmental conditions and trends, business environmental performance, and program performance.

IDEM developed indicators for the first time for the Fiscal Year 1997 EnPPA. Since then, the department has worked to refine its indicators. That process involved scientific and regulatory review by IDEM staff, active participation in national discussions regarding EPA core performance measures, as well as stakeholder review of the proposed indicators.

6. Relationship of Agreement to Grants

A performance partnership grant (PPG) is a single grant made to a state that combines funds which would otherwise be available through the individual categorical grants. The PPG is designed to provide maximum administrative and programmatic flexibility to states, allowing the combination of up to sixteen eligible categorical grants. The EnPPA replaces the categorical work plans for the grants that IDEM has combined.

The PPG and the EnPPA together are the primary tools for implementing the new management perspective leading to differential oversight of US EPA programs. This new perspective provides an incentive for state programs to perform well, rewarding strong state programs and freeing up federal resources for high priority environmental problems.

The benefits of combining the categorical grants into the PPG are:

- flexibility in addressing environmental priorities (both in terms of the types of activities and the level of resources),
- cost savings in addressing priorities through multi-media approaches,
- allowing the public to see the goals, objectives and resources (tax dollars) and how they are used; and
- reducing administrative efforts.

IDEM reporting requirements for the PPG will include financial and programmatic elements. The financial reporting will be completed annually with the submittal of a financial status report (FSR). Programmatic reporting will be fulfilled with the submittal of notes and materials from quarterly partnership meetings/calls and the Midterm Partnership Meeting as described in Section 4.

7. Quality Assurance (QA) and Quality Management Plan (QMP)

For the State FY 2003-2005 EnPPA agreement, IDEM is operating under the IDEM Quality Management Plan (QMP) which was signed and approved by EPA and became effective on August 10, 2001.

The QMP, which documents IDEM's Quality System (quality assurance policies and procedures), is consistent with the EPA QA/R-2 document entitled, EPA Requirements for Quality Management Plans, and the ANSI/ASQC E-4-1994, Specification and Guidelines for Environmental Data Collection and Environmental Technology Programs, developed by the American National Standards Institute and the American Society for Quality. The goals of the Agency-wide Quality System are to ensure that environmental programs and decisions are supported by data of the type and quality needed and expected for their intended use.

IDEM hired an Agency-wide Quality Assurance Manager (IDEM QA Manager) in mid-February 2001, who was initially responsible for coordinating the final development of the written Quality Management Plan. During the 2003-2005 EnPPA cycle, the IDEM QA Manager will be responsible for coordinating the implementation and assessment phases of IDEM's Quality System as described in the QMP.

The IDEM QA Manager will continue to scheduling meetings with the Quality Assurance Team (comprised of Program contacts who helped with the production of the QMP document), Senior Managers, and other Program Quality Assurance/Quality Control (QA/QC) staff to continue developing the policies and procedures required to implement and assess IDEM's Quality System. These policies and procedures will be developed for implementation by 6/30/04; and the adequacy of the Quality System and QMP will be assessed at least annually with 6/30/04, and 6/30/05, as the assessment target dates within the 2003-2005 EnPPA cycle.

8. Data Management

Both IDEM and Region 5 previously identified managing for environmental results as a priority for future development. An integral part of this philosophy is the collection and use of environmental data. EPA maintains a number of national databases to consolidate environmental data collected by the states. IDEM currently supplies data to many of EPA's national databases.

Traditionally, EPA and IDEM established commitments to provide data at the programmatic level. Within this agreement, IDEM makes an agency-wide commitment to continue providing data to the appropriate and applicable EPA national databases. The data shall be provided and entered under the established quality-assurance and quality-control parameters for each database.

IDEM's agency-wide data-support commitment applies only to those national databases that IDEM has agreed to support on or before 7/1/03. Subsequent substantive changes to quality-assurance plans or additional database commitments should be negotiated between IDEM and Region 5. The results of these negotiations should then be included in this agreement through the established amendment process.

2 State / Federal Relationship

The Indiana Department of Environmental Management (IDEM) and the U.S. Environmental Protection Agency, Region 5 (EPA) share a commitment to preserving and improving Indiana's environment. Implementing a compliance assurance and enforcement program with the goal of achieving and maintaining compliance with environmental requirements by all regulated entities is a major part of this shared commitment. To guide us in this shared responsibility, EPA and IDEM agree on the following principles:

- To manage for the environmental results that support agency goals:
- To encourage and maintain compliance through the most effective and appropriate application of the full spectrum of compliance assurance/assistance and enforcement tools;
- To use our respective resources and abilities as efficiently as possible;
- To institute joint, advance planning for the most effective coordination on priority setting and work sharing arrangements;
- To engage in advance, ongoing, consultation on enforcement and compliance assurance activities to discuss initiatives, implementation efforts, and reviewing the status of both filed cases and cases being developed; and
- To conduct periodic meetings to discuss data and other available information on compliance rates, compliance trends, and causes of non-compliance to use as a basis for developing strategies to address areas of concern, including compliance problems in particular programs.

Under this EnPPA, EPA and IDEM retain their respective authorities and responsibilities to conduct enforcement and compliance activities. While specific compliance and enforcement activities to be accomplished during the term of this agreement are included in the other sections of this agreement, a summary of IDEM and EPA roles in compliance and enforcement is presented here. Both agencies recognize the need for timely and open communication to identify and coordinate responsibilities, work activities and opportunities for joint actions.

9. Principles of IDEM / EPA Compliance Enforcement Relationship

State Role

Under federal programs for which EPA has authorized, delegated, or approved analogous State programs, IDEM will continue to assume the lead role in compliance assurance and enforcement, including compliance monitoring and compliance assistance. IDEM will be responsible for identifying and resolving in a timely and appropriate manner significant violations that it has detected. EPA will continue to provide compliance assurance and enforcement, including compliance monitoring and compliance assistance, for those federal programs, or portions thereof, which EPA cannot, or has not, authorized, delegated, or approved the State of Indiana. In addition, IDEM will coordinate with Indiana's local air pollution agencies to ensure partnerships in keeping with these principles at the local level. Multi-media compliance and enforcement activities will be coordinated through IDEM's Office of Enforcement. Multi-media compliance assistance activities will be coordinated through IDEM's Office will continue to coordinate single-media compliance activities with their media counterparts at EPA, while single-media enforcement activities will be coordinated through IDEM's Office of Enforcement.

Federal Role

As an environmental steward for the nation, EPA will work to ensure that national standards for the protection of human health and the environment are implemented, monitored and enforced consistently in all states. EPA fulfills this role by implementing a federal enforcement program and by providing assistance to state programs. Therefore, in addition to taking federal enforcement actions, EPA may agree with IDEM to assist IDEM by conducting inspections and providing compliance and technical assistance to the state and its regulated entities. Specific federal responsibilities in the State of Indiana may include:

- Work on national priorities (e.g., multi-media inspections, wet weather discharges. and Office of Enforcement and Compliance Assurance (OECA) priorities);
- Work on Region 5 priorities, including enforcement and compliance assurance in EPA's Principal Places. This joint approach may be used to accomplish the following: reduce toxics, especially mercury; slow urban sprawl, especially by promoting brownfields redevelopment; clean up sediments; protect and restore critical ecosystems; improve surface and drinking water quality; focus on Northwest Indiana; and protect people at risk, especially children and environmental justice communities;
- Ensure timely and appropriate enforcement in federal programs for which Indiana is approved, delegated, or authorized by EPA. Take actions where the State fails to do so, or refers to EPA;
- Assure maintenance of a level playing field and national consistency across state boundaries (e.g., companies with significant company-wide non-compliance in several states);
- Address pollution which may cross state or U.S. borders (i.e., watershed, airsheds, or other geographic units);
- Address criminal violations of federal law;
- Conduct multi-media inspections and enforcement at federal facilities;
- Take enforcement actions in non-delegated, partially-delegated, or non-delegable programs;
- Take enforcement actions to assure compliance with federal consent decrees, consent agreements, federal interagency agreements, judgments and orders. EPA will coordinate

activities and responsibilities with IDEM as set out below in "Joint Planning / Worksharing."

9.3. Joint Planning / Worksharing

EPA and IDEM will share the responsibility for maximizing environmental compliance in Indiana. To that end, we agree to conduct advance, joint planning each year; to allocate the work to be done; and to assess our joint performance periodically. To facilitate joint planning, the two agencies will form a Joint Planning Team. The team will involve representatives of each program office, and IDEM's Office of Enforcement, and will focus on effective completion of both multimedia and single-media work.

The goal of this activity is to promote greater joint work planning between EPA and IDEM to achieve more efficient identification of enforcement and compliance priorities, deployment of resources, higher levels of coordination, and greater compliance. On a regular basis, senior EPA and IDEM management will discuss enforcement and compliance assurance/assistance program directions, initiatives, and tradeoffs as well as specific enforcement and compliance concerns. Specifically, EPA and IDEM will work jointly to develop priorities taking into consideration national program priorities, regional priorities, and state priorities for enforcement and compliance assurance. EPA and IDEM will develop an appropriate work share arrangement to address identified priorities in federally authorized programs and to allow coordination of activities and sharing of results.

In order to institutionalize this coordination effort, the following planning process will be implemented:

There will be an annual kickoff meeting of compliance/enforcement managers from all media sections of both IDEM and EPA. This meeting should be a two-part meeting, one part multi-media and one part for the individual media to break out.

Both parts should address the following agenda items:

- recommit to the objectives of joint planning and managing for environmental results;
- explore the most effective application of the full spectrum of compliance tools;
- share draft priorities and ideas for compliance initiatives;
- identify areas of conflict or inconsistency and work toward resolution;
- agree on joint and separate roles and responsibilities;
- share successes and address challenges identified in self-assessments.

Subsequent monthly or quarterly meetings of individual media compliance and enforcement managers and multi-media meetings as needed to:

- share progress/outcomes of initiatives;
- continue work toward resolution of conflicts/challenges;
- discussion of multi-media strategies and shared work coordinated with IDEM's Office of Enforcement;
- ensure IDEM input into EPA MOA negotiations between US EPA Region 5 and Headquarters.

9.4. Consultation on Enforcement and Compliance Assurance Activities

Ongoing communication and consultation between EPA and IDEM is critical for a smooth working relationship. Specifically, it will enable discussion of initiatives, implementation efforts, and the status of projects/cases.

Therefore, we agree on the following steps that will promote a climate that encourages compliance and enforcement personnel from EPA and IDEM to work together.

- Periodic media-specific meetings and conference calls to review the pipeline of activities and current issues (one example is to have monthly conference calls and quarterly meetings). Discussions at these sessions should include progress on the pipeline of work being shared, and current issues/problems;
- Immediate communication with management on significant changes in scheduled activities or priorities;
- Identification of contacts for individual multi-media activities;
- Institutionalization of a meaningful inter-agency communications policy which includes advance (i.e. before a decision to act is made) consultation and cooperation between IDEM and EPA as part of the decision making process for initiation of: inspections and other compliance assurance activities or any enforcement action (or addition of any source to the High Priority Violation [HPV] or Significant Non-Compliance [SNC] lists);
- Ongoing communication during the pendency of all EPA enforcement cases where violations have taken place in Indiana to enable EPA and IDEM to coordinate injunctive relief and tailor supplemental environmental projects.
- There may be emergency situations or criminal matters that require EPA to take immediate action (e.g., seeking a temporary restraining order); in those circumstances, EPA will consult with IDEM as quickly as possible following initiation of the action.

Note: EPA and IDEM recognize the need to maintain adequate security for all information related to any compliance or enforcement activities contemplated by either agency. Therefore, EPA and IDEM agree not to share any information concerning such contemplated activities with any person or entity outside of the two agencies without a joint agreement to share that information. EPA and IDEM agree that all staff must be aware of this requirement of confidentiality.

9.5. Striving For Program Evaluation through Self-Audits and Assessment

EPA and IDEM recognize the importance of self assessments in the National Environmental Performance Partnership System and EPA's ongoing responsibility of maintaining a consistent national program across Region 5. IDEM and EPA share the view that excessive oversight of individual activities can lead to duplication of environmental protection resources. We recognize that changes in oversight techniques will be based in part on the success of the work sharing by EPA and IDEM, and on IDEM's preparedness to determine compliance effectively and take appropriate enforcement action. EPA's evaluation of IDEM's preparedness should also include a qualitative aspect, based on a mutual trust that EPA and IDEM are both committed to effectively implementing this Environmental Performance Partnership Agreement. To that end, IDEM and EPA program offices will work toward developing an understanding regarding IDEM's compliance and enforcement strategies. The self assessment process will include the following components:

 As part of the national dialogue between EPA and the States regarding Core Performance Measures, additional Accountability Measures have been identified for compliance and enforcement;

- IDEM agrees to continue entering compliance and enforcement activity data into the national data systems;
- IDEM will work toward improving its data systems in order to provide additional enforcement results information in the future. EPA will work toward focusing on whole program environmental performance, taking into account not only the number of activities conducted, but also the results of those activities, as additional results information becomes available.

9.6. Performance Measurement and Oversight

Accountability measures are to be used to review patterns and trends in noncompliance and to analyze program outcomes and outputs. IDEM agrees to continue to provide facility-specific compliance and enforcement information to the automated data systems which will provide the basis for the FY 2003/2004 accountability measures.

IDEM is working toward improving its data systems in order to provide additional enforcement results information in the future. US EPA Region 5 will work toward focusing on whole program environmental performance, taking into account not only the number of activities conducted, but also the results of those activities, as the additional results information becomes available.

US EPA Region 5 will also employ two new performance measures; the NPDES "Watch list" and a twice yearly "management report". These new measures are designed to gauge state performance in carrying out activities relating to the NPDES program.

Both agencies agree to perform self-assessments in accordance with the Review and Assessment section of this agreement to evaluate our progress and identify challenges. The compliance and enforcement portions of those self-assessments will be discussed during the joint planning meetings. US EPA Region 5 will use differential oversight and a range of responses to assess IDEM performance, moving toward the goal of increasing its use of periodic "system level" reviews and reducing "real time" reviews of individual actions.

10. Improved Data and Information Sharing

Improved data quality, data integration and information sharing will enable US EPA Region 5 and IDEM to better manage environmental programs and achieve the results we have targeted in this agreement. Specific activities we will pursue during this agreement period are detailed under the Agency-Wide Priority of Communicating with Communities. We agree that these activities should:

- Support the development of indicators and core performance measures and assess the trends they show.
- Improve our ability to assess the multiple environmental impacts of entire facilities that may contribute to Indiana's environmental problems.
- Improve our spatial ability to analyze environmental conditions and identify pollution sources that might have an impact on human health, ecosystems or economic development.
- Improve our staff's ability to access data that will aid in decision-making.
- Improve data analysis and sharing across programs.
- Improve electronic communications and linkages that will enhance our partnership to protect Indiana's environment.
- Improve processes to streamline environmental reporting for the regulated community, and evaluate and streamline current state reporting requirements for US EPA program databases.
- Improve public access to information about environmental conditions, facility compliance records, and agency activities.
- Continue to submit timely and accurate data into existing regional/national databases.

11. Environmental Justice

The Indiana Department of Environmental Management is committed to protecting and preserving the quality of Indiana's air, water and land for all our citizens in an equitable and effective manner. An important part of that commitment is ensuring that all communities are included in a meaningful way in any environmental decision making that directly or indirectly affects them.

The concept of environmental justice includes the fair treatment and meaningful involvement of all people in the implementation of environmental decision making pursuant to all federal and state environmental statutes and rules. In addition, Title VI of the Civil Rights Act of 1964 reinforces environmental justice in that it contains non-discrimination requirements that must be followed by all recipients of federal funding.

Therefore the Indiana Department of Environmental Management intends to address both of our obligations under Title VI of the Civil Rights Act as well as our responsibility to ensure that all people in our state are included in making decisions that affect their environment by implementing an environmental justice strategy. To achieve the Department's environmental justice goals, the strategies pursued as a result of this planning process will be ongoing and sustainable, will be developed in partnership with the communities affected by environmental justice issues, and will involve the institutionalization of processes and policies to reduce the disparate impact of environmental burden on people of color and low income status.

Key Implementation Principles

- 1. Awareness and Sensitivity: The department will ensure that all staff involved in environmental decision making are sensitive to the nature of and the cumulative environmental burden on the population affected by those decisions.
- 2. Public Participation: The Department will continue to improve its efforts to put into place effective means for soliciting meaningful public input on environmental decision making.
- 3. Inclusiveness: The Department will include all interested parties in the process of fashioning an environmental justice strategy.
- 4. Proactivity: The Department will actively pursue resolutions to environmental justice disputes or arranging for the facilitation of those disputes between all of the interested parties.
- 5. Sustainability: The environmental justice strategy devised in partnership by the Department and other stakeholders will include the means for ongoing sustainability of programs implemented pursuant to the strategy as well as systemic evaluation measures.

Implementation Steps

The Department has:

- Established the Indiana Environmental Justice Advisory Committee comprised of representatives from neighborhood organizations, builders, attorneys, state and local governments, environmentalists, cities and towns to assist the agency in the implementation of its strategic plan.
- Identified geographical areas of environmental justice concern.
- Provided an environmental justice coordinator to serve as a point of contact/clearinghouse within the Department to provide a communication channel between affected communities, industries, and all levels of government.

 Committed to the performance of milestones to integrate the Environmental Justice Strategic Plan throughout all of the Department's environmental programs.

Future Implementation Steps

During the upcoming months the Department will:

- Conduct workshops throughout the state to educate communities about environmental justice issues and their role as participants in environmental decision making.
- Developed plans to institutionalize within the Department's procedures, additional or more appropriate public process for rule makings, facility sitings or economic development incentive packages that affect environmental justice focus areas.
- Conduct internal training of Department staff on environmental justice issues and processes with the goal of integration of those concepts into its day-to-day work.
- Developed plans to periodically evaluate the effectiveness of the Environmental Justice Strategic Plan and the Department's implementation of the Plan.
- Before environmental decisions are made, actively facilitate the resolution of environmental justice disputes between communities and industries during the up-front siting process for new and expanded facilities.
- Institutionalize within the Department's procedures, additional or more appropriate public processes for rule making, facility sitings, or economic development incentive packages that affect impacted communities.

3 IDEM's Public Involvement Activities

IDEM pursued the involvement of citizens, groups, and other government entities as it developed this agreement. IDEM offices conducted meetings with stakeholders to discuss goal development. These meetings included the regularly scheduled meetings of our agency's policy setting boards, such as the Air Pollution Control Board and the Clean Manufacturing Technology and Safe Materials Board. They also included meetings with other groups formed to deal with a more specific issue or program, such as the Partners for Pollution Prevention. Many managers and staff spent a significant amount of time discussing goals, objectives and indicators with stakeholders.

IDEM senior managers also made presentations to community groups, business seminars and other forums to offer a variety of customers an opportunity to participate in the development of Agency-Wide and Office Priorities. These presentations were well received and will continue.

Draft copies of this Agreement were distributed to interested stakeholders and placed on IDEM's web site for public comment.

IDEM will continue to work to improve our public outreach and involvement efforts. IDEM managers will continue to describe the impact of the agreement for their audiences, and encourage businesses and local communities to work toward statewide goals and objectives. We will continue to update board members on progress toward goals in this agreement and the development of the next one. We will continue to increase the partnership between IDEM and US EPA Region 5 in communicating with and listening to the citizens of Indiana.

4 Review/Assessment Process

The review and assessment process for this agreement and the performance partnership grant will provide a forum for meaningful, face-to-face communication between IDEM and US EPA Region 5. The process will:

- Measure and analyze the environmental and programmatic results;
- Recognize and reward success in achieving environmental results;
- Identify emerging issues, environmental trends and areas and strategies for improvement;
- Provide flexibility in both form and substance, as warranted by program performance;
- Seek to eliminate duplicative or unnecessary efforts and reporting;
- Provide an accountability mechanism for evaluating and maintaining national consistency, while allowing for differences among individual state programs;
- Respond with appropriate solutions, which may include redirecting goals and resources; obtaining federal assistance; or increasing federal oversight and involvement in the management of delegated programs; and
- Encourage IDEM to find innovative program implementation alternatives, as long as the desired result is achieved.

The success of this agreement relies on clear, constructive communication and the commitment of IDEM and US EPA Region 5 to work together to solve problems and improve the programs. If any differences on specific issues or problems arise, IDEM and US EPA Region 5 will move quickly to resolve them at the staff level or elevate the issue through the dispute resolution process described in Section 5: Dispute Resolution Process and Appendix B: Dispute Resolution Model.

To facilitate frequent and open communication we will:

- 1. Hold Conference Calls Quarterly: In order to share ideas, progress and plan program activities, conference calls will be held quarterly for each program. By 9/15/03, IDEM and US EPA Region 5 will identify the managers responsible for convening the calls and developing the agendas. Both IDEM and US EPA Region 5 may contribute topics for the agenda. Less formal ongoing communication during the agreement period is encouraged.
- 2. Hold Partnership Meetings Annually: IDEM and US EPA Region 5 will meet annually to assess progress on the Environmental Performance Partnership Agreement. IDEM will conduct self-assessments once per year and will provide EPA with update on all projects and performance measures. IDEM and US EPA Region 5 will work together to set the agenda and exchange appropriate materials for discussion, including areas for improvement, successes in implementation, progress toward the goals, objectives and outcomes in the agreement, review of core performance measures and other issues that will impact the agreement (i.e., new legislation or policies). After the meeting, notes will be prepared and distributed which highlight the issues discussed, including the next steps and any proposed amendments to this agreement. Meeting notes and materials will serve as documentation of progress under the agreement. Participants will include staff and managers responsible for achieving the objectives under the

environmental/strategic goals. The meetings will include exit briefings for IDEM assistant commissioners or deputy commissioners, if requested.

- 3. Review State-Federal Relationship Quarterly: Each quarter during the agreement period, a conference call will be held between the senior IDEM manager and senior US EPA Region 5 manager responsible for monitoring and implementing the EnPPA in each agency. This conference call will serve as a checkpoint for elevating state-federal relationship issues, celebrating successes, identifying barriers, and reaffirming the agreement's validity for both agencies.
- 4. Hold Midterm Partnership Meeting: Senior staff from IDEM and US EPA Region 5 will hold a Partnership Meeting in October 2004.

This Midterm Partnership meeting will:

- assess IDEM and US EPA Region 5's performance against the objectives, indicators and core performance measures in this agreement;
- analyze current program strengths and areas for improvement;
- identify emerging issues and environmental trends; and
- suggest any specific actions, approaches or suggestions for IDEM and US EPA Region 5 to improve progress under the next agreement.
- 5. Self-assessment: IDEM and EPA Region 5 will provide a written self-assessment by 9/30/04 and 9/30/05.

Amendments

During the agreement period, it may be necessary to amend the agreement to respond to legislative mandates, emerging issues, new priorities or other unforeseen issues. IDEM's Office of Planning and Assessment will submit proposed amendments to US EPA Region 5 as needed, but no more often than once each quarter. The Office of the Regional Administrator will be responsible for coordinating US EPA Region 5's review and approval of those amendments.

Other Reporting Relationships

During the agreement period, IDEM will provide information and reports to specific US EPA Region 5 program areas as outlined in annual guidance. The drinking water annual program guidance or Annual Resource Deployment Plan (ARDP) end of year report is due to Region 5 each January 1st. US EPA Region 5 will conduct an annual evaluation of IDEM program performance pursuant to grant regulations and guidance. IDEM will continue to operate a US EPA Region 5 quality assurance program and submit timely and accurate data into existing regional/national databases.

The following tables show the relationships between the calendar year, the federal fiscal year, the state fiscal year and the time frames for the conference calls, partnership meetings, self-assessments and in "Indiana's Annual State of the Environment Report", which have been described above:

Fiscal Years

Calendar Year	Federal Fiscal Year	State Fiscal Year
July - September, 2001	FFY 2003	SFY 2004
October - December, 2001	FFY 2004	
January - March, 2002		
April- June, 2002		
July- September, 2002		SFY 2005
October – December, 2002	FFY 2005	

January - March, 2003	
April- June 2003	
July - September, 2003	SFY 2006

Table 1: Fiscal Years

Time Frames

Calendar Year	Conference Calls	Partnership Meetings	Self Assessment	Indiana's Annual State of the Environment Report
July - September, 2003				
October – December, 2003			*	
January - March, 2004	X			
April - June, 2004		Х		
July - September, 2004	X		**	X
October - December, 2004				
January - March, 2005	Х			
April- June 2005		Х		
July - September, 2005			***	X

Table 2: Time Frames

- * Final Self-Assessments for 2001-2003 Environmental Performance Partnership Agreement
- ** Mid-Term Self-Assessment for 2003-2005 Environmental Performance Partnership Agreement
- *** Final Self-Assessments for 2003-2005 Environmental Performance Partnership Agreement

5 Dispute Resolution Process

IDEM and US EPA Region 5 will use the following agreed-upon dispute resolution process to handle the conflicts that may arise as we implement our environmental programs. We will treat the resolution process as an opportunity to improve our joint efforts and not as an indication of failure. For the purpose of this agreement, the following definitions will apply.

Dispute - any disagreement over an issue that prevents a matter from going forward.

Resolution process - a process whereby the parties move from disagreement to agreement over an issue.

12. Informal Dispute Resolution Guiding Principles

IDEM and US EPA Region 5 will ensure those programs:

- Recognize conflict as a normal part of the state/federal relationship.
- Approach disagreement as a mutual problem requiring efforts from both agencies to resolve.
- Approach the discussion as an opportunity to improve decision-making through joint efforts.
- Aim for resolution at the staff level, while keeping management informed.
- Seriously consider all issues raised, but address them in a prioritized manner to ensure that sufficient time is allocated to the most significant issues.
- Promptly disclose underlying assumptions, frames of reference and other driving forces.
- Clearly differentiate positions and check understanding of content and process with all appropriate or affected parties to ensure acceptance by all stakeholders.
- Document discussions to minimize future misunderstandings.
- Pay attention to time frames and/or deadlines and escalate quickly when necessary.

13. Formal Conflict Resolution

There are several formalized programmatic conflict resolution procedures that need to be invoked if the informal route has failed to resolve all issues. 40 CFR 31.70 outlines the formal grant dispute procedures. There is also a national pollutant discharge elimination system (NPDES) conflict resolution procedure. In addition, the Superfund program sponsors an alternate dispute resolution contract that provides neutral third parties to facilitate conflict resolution for projects accepted into the program. These are all time consuming and should be reserved for the most contentious issues. For less contentious matters, we will use the following procedures:

- 1. Principle: All disputes should be resolved at the front line or staff level.
- 2. Time frame: Generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. If unresolved at the end of two weeks, the issue should be raised to the next level of each organization.
- 3. Escalation: When there is no resolution and the two weeks have passed, there should be comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

See Dispute Resolution Model in Appendix B.

6 Conclusion

The 2003-2005 Environmental Performance Partnership Agreement was developed to guide and frame our course, to provide common goals and opportunities for collaborative efforts, and to promote the most effective allocation of resources. This agreement will help us foster a stronger working relationship and strengthen our ability to address and resolve the complex environmental challenges now facing us. Ultimately, this shared vision will help us reach our long-term goal of a healthier, cleaner environment.

7 Agreement

This agreement is hereby entered into or unless amended by mutual consent.	n this day of 7/1/03 and remains in effect until 6/30/05
For the State of Indiana:	
Lori F. Kaplan Commissioner Indiana Department of Environmental Manageme	 Date ent
For the U.S. Environmental Protec	tion Agency:
Thomas V. Skinner Regional Administrator Region 5, United States Environmental Protection	Date n Agency

Appendix Appendix IDEM / EPA Region 5 Org. Charts

Organizational Charts are available at:

Indiana Department of Environmental Management:

http://www.in.gov/idem/about/orgchart.html

EPA Region 5:

http://www.epa.gov/region5/orgchart.htm

B Dispute Resolution Model

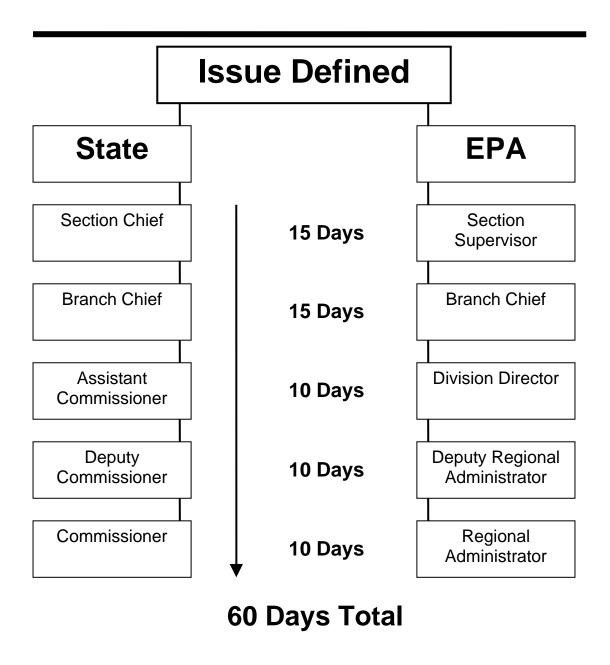


Figure 1: Dispute Resolution Model

Appendix Acronym List

AA Administrative Assistant
AEL Active Exceptions List
AG Attorney General

AHERA Asbestos Hazard Emergency Response Act AIRS Aerometric Information Retrieval System

AL Action Level

ANSI American National Standards Institute

APTI Air Pollution Training Institute
ARB Air Resources Board (Grissom)
ASQC American Society for Quality Control
AWMA Air and Waste Management Association

BAA Broad Agency Announcement C/E Compliance and Enforcement

CA Corrective Action

CAATS Computer Assisted Approval and Tracking System

CAM Compliance Assurance Monitoring

CAP Corrective Action Plan, Community Assistance Program, or Compliance Advisory

Panel

CD Compact Disk

CE Compliance and Enforcement
CEI Compliance Evaluation Inspection

CEMS Compliance/Enforcement Management System, Continuous Emissions

Monitoring Systems

CERCLA Comprehensive Environmental Response, Compensation and Liability Act (1980)

CERCLIS Comprehensive Environmental Response, Compensation and Liability

Information System

CFR Code of Federal Regulations

CITES Central Indiana Technical and Environmental Societies

CMTB Clean Manufacturing Technology Board

CMTI Clean Manufacturing Technology and Safe Materials Institute

COMS Continuous Emissions Monitoring Systems

COP Current Operating Procedure
CPM Core Performance Measure
CSO Combined Sewer Overflow

Compliance and Technical Assistance Program (CTAP) Compliance and Technical

Assistance Program (IDEM)

DC District of Columbia

DNR Indiana Department of Natural Resources

DOD U.S. Department of Defense
DWB Drinking Water Branch (IDEM)
DWSRF Drinking Water State Revolving Fund
EMI Environmental Management Institute

EMPACT Environmental Monitoring for Public Access and Community Tracking EMS Emergency Response System, Environmental Management System

EnPPA Environmental Performance Partnership Agreement

EPA U.S. Environmental Protection Agency
EQSC Environmental Quality Service Council
ERAG Ecological Risk Assessment Guidance
ESRI Environmental Systems Research Institute

FCA Fish Consumption Advisory

FESOP Federally Enforceable State Operating Permit

FFY Federal Fiscal Year FSR Financial Status Report

FY Fiscal Year

GIS Geographic Information System

GLPPR Great Lakes Pollution Prevention Roundtable GPRA Government Performance and Results Act

GPS Global Positioning System
HAP Hazardous Air Pollutants
HD Health Department

HDDS Heavy Duty Diesel Settlement HHW Household Hazardous Waste

HPV High Priority Violation
HR Human Resources
HRS Hazard Ranking System

I & M Vehicle Inspection and Maintenance

I/M Inspection/Maintenance

IC Indiana Code

IDEM Indiana Department of Environmental Management

IEHA Indiana Environmental Health Association

IEI Indiana Environmental Institute
IFES Indiana Forum Environmental Safety
IIOA Indiana Industrial Operators Association

IKE Improving Kids' Environment
IMA Indiana Manufacturers' Association

IN Indiana

IOC Inorganic Chemicals

IPM Integrated Pest Management

ISM Indiana Scoring Model

ISO International Standard Organization

I-STEPS Indiana State Emissions Processing System

IT Information Technology

LADCO Lake Michigan Air Directors Consortium

LEAP Learning and Environmental Awareness Partnership

LEPC Local Emergency Planning Committee

LQG Large Quantity Generator
LSA Legislative Services Agency

Leaking Underground Storage Tank (LUST)

Leaking Underground Storage Tank

(UST)

MACS Media and Communications Services (IDEM)
MACT Maximum Achievable Control Technologies

MCL Maximum Contaminant Level

METS Multimedia Enforcement Tracking System

MM Multimedia

MOA Memorandum of Agreement

MOS Measure of Success

MOU Memorandum of Understanding

N/A Not Applicable

NAAQS National Ambient Air Quality Standards

NEPPS National Environmental Performance Partnership System
NESHAP National Emissions Standards for Hazardous Air Pollutants

NIRPC Northwest Indiana Regional Plan Commission

NOx Nitrogen Oxides

NPD Nonrule Policy Document

National Pollutant Discharge Elimination System (NPDES)

National Pollution

Discharge Elimination System

NPL National Priorities List

NPPR National Pollution Prevention Roundtable

NPS Nonpoint Source

NRC National Recycling Coalition

NW Northwest

O&M Operations and Maintenance
OAQ Office of Air Quality (IDEM)
OBDII On-Board Diagnostic Testing
OE Office of Enforcement (IDEM)

OECA Office of Enforcement and Compliance Assurance

OLC Office of Legal Council (IDEM)
OLQ Office of Land Quality (IDEM)

OMBA Office of Management, Budget and Administration (IDEM)

OPA Oil Pollution Act

OPPTA Office of Pollution Prevention and Technical Assistance (IDEM)

OSHA Occupational Safety and Health Administration

OVC Office of Voluntary Compliance (IDEM)

OWQ Office of Water Quality (IDEM)

P2 Pollution Prevention

P4P2 Partners for Pollution Prevention

PA/VSI Preliminary Assessment / Visual Site Investigation

PBT Persistent Bioaccumulative Toxics

PCB Polychlorinated Biphenyls
PDF Portable, Downloadable File

PM2.5 Particulate Matter 2.5 millimeters in diameter

POTW Publicly Owned Treatment Works
PPG Performance Partnership Grant
PSD Prevention of Significant Deterioration
PWS Public Water System, Public Water Supply

PWSS Public Water Supply System

QA Quality Assurance

QAPP Quality Assurance Project Plan QMP Quality Management Plan

Rads Radionuclide

RCRA Resource Conservation and Recovery Act

RCRAInfo Resource Conservation and Recovery Information System RCRIS Resource Conservation and Recovery Information System

(this terminology is superseded by RCRAInfo)

RFA RCRA Facility Assessment
RFI RCRA Facility Investigation
RI Reconnaissance Inspections
RISC Risk Integrated System of Closure

RP Responsible Party

SDWIS Safe Drinking Water Information System

SEM Senior Environmental Manager

SFY State Fiscal Year

SGP Strategic Goals Program

SI Site Inspection

SIP State Implementation Plan SNC Significant Noncompliance

SO2 Sulfur Dioxide

SOC Synthetic Organic Compounds

SPA State Program Approval

SPD State Personnel Department (Indiana)

SSO Sanitary Sewer Overflow

SSOA Source Specific Operating Agreement
STARS Semi-annual Performance Measures Report

SWMD Solid Waste Management District

SWQMS Surface Water Quality Monitoring Strategy

SWTR Surface Water Treatment Rule
TMDL Total Maximum Daily Load
TRI Toxic Release Inventory

TSD Treatment, Storage and Disposal

TT Treatment Technique
TTHM Total Trihalomethane
TVOP Title 5 Operating Permits
UIC Underground Injection Control

ULCERS Underground Leaking, Community Right to Know and Emergency Response

System

US EPA U.S. Environmental Protection Agency

USDA U.S. Department of Agriculture

USGS U.S. Geological Survey

UST Underground Storage Tank (UST)
UWA Unified Watershed Assessment
VOC Volatile Organic Compounds

VRP Voluntary Remediation Program (IDEM)

WPCB Water Pollution Control Board WQM Water Quality Management WRS Watershed Restoration Strategy

Cross-Office Priority Acronym Key

OLQ: Office of Land Quality

OWQ: Office of Water Quality

OPPTA: Office of Pollution Prevention and Technical Assistance

OPA: Office of Planning and Assessment

OAQ: Office of Air Quality

OMBA - Office of Management and Budget Administration - Human Resources

HR:

OMBA - Office of Management and Budget Administration - Business Services

BSD: Division

OMBA - Office of Management and Budget Administration - Fiscal and

FA: Accounting

NWRO: Northwest Regional Office
SWRO: Southwest Regional Office

NRO: Northern Regional Office

MACS: Media and Communications Services

OE: Office of Enforcement
OLC: Office of Legal Counsel

APPENDIX C: ACRONYM LIST

OBLR: Office of Business and Legislative Relations

OI: Office of Investigations

OAR: Office of Agricultural Relations

OCR: Office of Community Relations

All Applies to all offices/office staff

Offices:

OPPP: Office of Public Policy and Planning

OER: Office of Environmental Results